



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

June 16, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-11787

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2017	SM Conf. and emails with GJV	0.30 230.00/hr	69.00
	GJV Conference with Dr. and Mr. Porter	1.70 320.00/hr	544.00
5/15/2017	SM Porter - Conf. with GJV re: basis of claims	0.20 230.00/hr	46.00
	GJV Review issues associated with termination and prepare memorandum	1.90 320.00/hr	608.00
5/17/2017	SM Review GJV and client emails	0.20 230.00/hr	46.00
	GJV Review emails	0.20 320.00/hr	64.00
	GJV E-mails and analysis of possible claims	1.00 320.00/hr	320.00
5/18/2017	SM Emails and conf. with GJV; research re: interaction of employment agreement and staff membership	1.60 230.00/hr	368.00
	GJV Review several emails; conf. S. Merlo re: disability and email Dr. Porter	0.50 320.00/hr	160.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/18/2017	GJV	E-mail	0.10 320.00/hr	32.00
5/19/2017	SM	Review D-H disability policies; conf. with GJV re: bylaws, disability, and whistleblower concerns; emails with client	2.00 230.00/hr	460.00
	GJV	Review disability issue	0.30 320.00/hr	96.00
	GJV	Prepare e-mails	0.20 320.00/hr	64.00
5/22/2017	SM	Review GJV and client email	0.10 230.00/hr	23.00
5/23/2017	SM	Conf. and emails with GJV	0.20 230.00/hr	46.00
	GJV	E-mails	0.10 320.00/hr	32.00
	GJV	Review possible claims	0.20 320.00/hr	64.00
	GJV	Review M. Porter email and respond with analysis of possible claims and course of action	0.80 320.00/hr	256.00
	GJV	E-mails	0.20 320.00/hr	64.00
5/24/2017	GJV	T/c Karen W. and emails and prepare analysis of possible claims	1.30 320.00/hr	416.00
5/25/2017	SM	Conf. with GJV re: claims; research	1.90 230.00/hr	437.00
	GJV	Review letter and email Dr. Porter	0.30 320.00/hr	96.00
	GJV	Analysis of disability claim and possible whistleblower claims	1.30 320.00/hr	416.00
	GJV	Conf. Dr. Porter and husband	1.10 320.00/hr	352.00
	GJV	E-mail summary	0.40 320.00/hr	128.00
5/26/2017	GJV	T/c Dr. Porter	0.20 320.00/hr	64.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/29/2017	GJV Review file re: email history	1.00 320.00/hr	320.00
5/30/2017	JK Search & file topical story/video per this matter and email from GJV	0.50 90.00/hr	45.00
	GJV Review correspondence	0.10 320.00/hr	32.00
	KF Organizing and scanning emails; making chronology	2.25 50.00/hr	112.50
	For professional services rendered	22.15	\$5,780.50
	Additional Charges :		
5/25/2017	Electronic research charges.		126.53
	Total costs		\$126.53
	Total amount of this bill		\$5,907.03
	Balance due		\$5,907.03

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	12.90	320.00	\$4,128.00
Julia Korkus	0.50	90.00	\$45.00
Katie Fenton	2.25	50.00	\$112.50
Sarah Merlo	6.50	230.00	\$1,495.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

July 12, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-11869

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/9/2017	GJV	Review M. Porter email, letter from D-H re: proposed severance agreement and prepare email to Dr. Porter re: plan and options	1.00 320.00/hr	320.00
6/13/2017	GJV	Conference with Dr. and Mr. Porter and J. Korkus	1.80 320.00/hr	576.00
	GJV	Prepare memorandum of meeting	0.30 320.00/hr	96.00
	GJV	Review outline of meeting and summary by M. Porter re: Dr. Hsu	0.40 320.00/hr	128.00
	JK	JK/GJV met w/ client & her husband (2 hrs) at V&A office on matter direction & info gathering; JK note taking.	2.00 100.00/hr	200.00
	JK	Drafting Memo of 6/13 2 hr client meeting/factual summary	3.00 100.00/hr	300.00
6/14/2017	GJV	Review Litigation Hold letter	0.30 320.00/hr	96.00
	GJV	Review memorandum	0.10 320.00/hr	32.00
	JK	Reading & reviewing client matter file/documents per development of litigation hold names and letter	3.00 100.00/hr	300.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/14/2017	JK Email communications, reviewing & record keeping per new incoming client matter material.	1.00 100.00/hr	100.00
6/15/2017	GJV E-mail and review potential whistleblower claim	0.20 320.00/hr	64.00
	JK Reading client file & matter history of email correspondence (green file) provided by MP. Started timeline.	4.00 100.00/hr	400.00
6/16/2017	GJV E-mails	0.10 320.00/hr	32.00
	JK Conference w/GJV, then JK reading, email follow-up and filing re: matter documentation and compilation needs for next steps	1.50 100.00/hr	150.00
6/19/2017	JK Reading client files.	0.60 100.00/hr	60.00
6/20/2017	JK Reading client files.	1.00 100.00/hr	100.00
6/21/2017	JK Brief conference with GJV on matter planning and reviewing and reading files.	1.30 100.00/hr	130.00
	JK Review material and Draft litigation hold letter	2.30 100.00/hr	230.00
6/23/2017	GJV Review elements of possible claims and work on Litigation Hold letter	1.70 320.00/hr	544.00
6/27/2017	JK Reviewed new Porter emails and information.	0.50 100.00/hr	50.00
	GJV Conference with Dr. and Mr. Porter	1.00 320.00/hr	320.00
6/28/2017	GJV Revise litigation hold letter	0.20 320.00/hr	64.00
6/29/2017	SM Review litigation hold draft letter and provide comments	0.20 230.00/hr	46.00
	GJV Revise litigation hold letter	0.20 320.00/hr	64.00
	For professional services rendered	27.70	\$4,402.00
	Previous balance		\$5,907.03
6/22/2017	Payment - thank you. Check No. 5049		(\$5,907.03)

Misty Porter

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Amount

Total payments and adjustments

(\$5,907.03)

Balance due

\$4,402.00Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	7.30	320.00	\$2,336.00
Julia Korkus	20.20	100.00	\$2,020.00
Sarah Merlo	0.20	230.00	\$46.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

August 07, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-11951

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
7/6/2017	JK Review GJV/Porter emails re: letter from alumni residents: Researched news material on topic. Memorandum on meeting.	3.00 100.00/hr	300.00
7/7/2017	JK Review GJV/Porter emails re: ACGME, training, and grievance policies, filing, read topical material.	2.00 100.00/hr	200.00
7/11/2017	JK Conference with GJV re: Porter and complaint preparation.	0.20 100.00/hr	20.00
7/12/2017	JK Research and email on NH Law and commencement of action re: serving a complaint.	1.50 100.00/hr	150.00
	GJV T/c Dr. Porter and review outline for complaint	0.30 320.00/hr	96.00
7/14/2017	GJV Outline for complaint	1.10 320.00/hr	352.00
7/15/2017	GJV Review numerous emails an background documents and research re: basis for claims	2.70 320.00/hr	864.00
7/17/2017	SM Review GJV email re: rights as Member	0.10 230.00/hr	23.00
	JK Porter preparation and meeting; background gathering and outline of complaint.	2.50 100.00/hr	250.00

Misty Porter

			<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2017	JK	Drafted memorandum on Porter meeting; Email, read, file re: new meeting material HR email.	1.00 100.00/hr	100.00
	GJV	Conference with Tom and Misty Porter and J. Korkus	2.80 320.00/hr	896.00
	GJV	Prepare file memorandum on issues discussed in meeting	1.00 320.00/hr	320.00
	GJV	Review file memorandum and review and edit emails	0.40 320.00/hr	128.00
	GJV	E-mails	0.30 320.00/hr	96.00
7/18/2017	JK	Emails from Porter and GJV. Read and organize material for complaint.	1.70 100.00/hr	170.00
7/19/2017	GJV	Outline research issues re: claim	0.30 320.00/hr	96.00
	GJV	Research	0.40 320.00/hr	128.00
7/20/2017	SM	Conf. and email with GJV re: complaint; research re: whistleblower protection and wrongful termination claims	1.00 230.00/hr	230.00
	JK	Review, research, read memo, emails, filing, re: VPR article, reporter, Barry Smith and new ACGME/ART material/emails.	3.00 100.00/hr	300.00
	GJV	Telephone conference with Dr. Smith and prepare file memorandum on conversation	1.10 320.00/hr	352.00
	GJV	Review background materials and emails and outline theories for various claims	1.30 320.00/hr	416.00
7/21/2017	GJV	Review emails with Dr. Porter and emails form Dr. Smith	0.30 320.00/hr	96.00
7/24/2017	GJV	Review draft grievance ACGME	0.20 320.00/hr	64.00
	GJV	E-mails	0.30 320.00/hr	96.00
7/25/2017	JK	Prepare Porter case binder and complaint material.	2.00 100.00/hr	200.00
7/26/2017	SM	Review Professional Staff By-Laws	0.70 230.00/hr	161.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2017 JK	Read Porter material and emails. Emails with and re: VPR reporter/VPR article and quote background/retraction.	2.20 100.00/hr	220.00
7/27/2017 JK	Prepare Porter case binder, organize key material/emails, and complaint material.	1.70 100.00/hr	170.00
	For professional services rendered	35.10	\$6,494.00
	Additional Charges :		
7/20/2017	Electronic research charges.		26.98
	Total costs		<u>\$26.98</u>
	Total amount of this bill		\$6,520.98
	Previous balance		\$4,402.00
7/18/2017	Payment - thank you. Check No. 5064		<u>(\$4,402.00)</u>
	Total payments and adjustments		<u>(\$4,402.00)</u>
	Balance due		<u><u>\$6,520.98</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	12.50	320.00	\$4,000.00
Julia Korkus	20.80	100.00	\$2,080.00
Sarah Merlo	1.80	230.00	\$414.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

September 11, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-11979

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
8/3/2017	JK	Research and provide comment on ACGME resident training topic.	0.10 100.00/hr	10.00
	GJV	Prepare draft of complaint	1.80 320.00/hr	576.00
8/4/2017	GJV	Prepare complaint	1.00 320.00/hr	320.00
	GJV	Research and work on complaint	1.80 320.00/hr	576.00
8/5/2017	SM	Review GJV emails	0.20 230.00/hr	46.00
	GJV	Complaint	1.70 320.00/hr	544.00
8/6/2017	GJV	Draft complaint and research	4.70 320.00/hr	1,504.00
8/7/2017	GJV	Draft complaint	3.30 320.00/hr	1,056.00
8/8/2017	SM	Review emails re: benefits; emails with GJV; review DH benefit guide	1.00 230.00/hr	230.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/8/2017	JK Review and file matter correspondence; edit timeline.	0.50 100.00/hr	50.00
	GJV Revise complaint	0.30 320.00/hr	96.00
	GJV Research disabilities issue and work on complaint	0.90 320.00/hr	288.00
8/9/2017	SM Review memo and conf. with GJV re: sex discrimination claims; research re: venue; email to GJV	0.80 230.00/hr	184.00
	GJV Prepare complaint and research	2.80 320.00/hr	896.00
8/10/2017	JK Memo to GJV on M. Porter re: timeline milestones and supporting email/information.	1.00 100.00/hr	100.00
	SM Conf. with GJV re: disability retaliation claims	0.20 230.00/hr	46.00
	GJV Prepare complaint	1.60 320.00/hr	512.00
8/11/2017	GJV Multiple e-mails	1.00 320.00/hr	320.00
	SM Review emails re: gender discrimination	0.20 230.00/hr	46.00
8/14/2017	JK Email and meeting with VPR reporter re: Closure of D-H REI article background	0.60 100.00/hr	60.00
8/17/2017	GJV Work on complaint	1.90 320.00/hr	608.00
8/18/2017	GJV Work on complaint	1.10 320.00/hr	352.00
8/19/2017	GJV Work on complaint	1.80 320.00/hr	576.00
8/20/2017	GJV Complaint	1.50 320.00/hr	480.00
8/21/2017	GJV Complaint and research on Vermont federal court and jurisdiction	2.70 320.00/hr	864.00
	SM Review GJV email re: jurisdiction	0.10 230.00/hr	23.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/21/2017	SN Research per GJV RE DHMC entities in VT courts	1.20 80.00/hr	96.00
8/22/2017	JK Complaint research	1.50 100.00/hr	150.00
	GJV Complaint and research on jurisdiction and claims under disability statutes	4.20 320.00/hr	1,344.00
8/23/2017	GJV E-mails	0.20 320.00/hr	64.00
	GJV Work on complaint	3.30 320.00/hr	1,056.00
	GJV E-mails with Dr. Porter	0.30 320.00/hr	96.00
8/24/2017	SM Emails with GJV re: claims	0.20 230.00/hr	46.00
	GJV Complaint	1.60 320.00/hr	512.00
8/25/2017	GJV Work on revisions to complaint	2.60 320.00/hr	832.00
	SM Review GJV email re: jurisdiction and claims	0.20 230.00/hr	46.00
8/27/2017	SM Review GJV email re: complaint	0.10 230.00/hr	23.00
	GJV Revise complaint	1.40 320.00/hr	448.00
8/28/2017	SM Conf. and emails with GJV; review draft complaint	0.60 230.00/hr	138.00
	GJV Review wrongful discharge law and whistleblower claims	0.20 320.00/hr	64.00
	GJV Work on complaint	0.30 320.00/hr	96.00
8/29/2017	JK Research re: news contacts and filings.	1.00 100.00/hr	100.00
	SM Review draft complaint and draft ACGME letter	1.10 230.00/hr	253.00

Misty Porter

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	<u>Hrs/Rate</u>	<u>Amount</u>
8/30/2017 SM Revisions to draft complaint	1.50 230.00/hr	345.00
GJV Complaint	0.20 320.00/hr	64.00
Subtotal of charges		\$16,136.00
Adjustment		(\$2,200.00)
For professional services rendered	56.30	\$13,936.00
Additional Charges :		
8/21/2017 Electronic research charges.		229.58
Total amount of this bill		\$14,165.58
Previous balance		\$6,520.98
8/15/2017 Payment - thank you. Check No. 5076		(\$6,520.98)
Total payments and adjustments		(\$6,520.98)
Balance due		\$14,165.58

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	44.20	320.00	\$12,215.59
Julia Korkus	4.70	100.00	\$405.92
Sarah Nunan	1.20	80.00	\$82.91
Sarah Merlo	6.20	230.00	\$1,231.58



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

October 04, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-12115

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
9/1/2017	SM	Revisions to draft complaint	2.50 230.00/hr	575.00
	GJV	E-mail	0.20 320.00/hr	64.00
9/5/2017	SM	Review and revise draft complaint	4.00 230.00/hr	920.00
	GJV	E-mail	0.10 320.00/hr	32.00
9/6/2017	SM	Revisions to draft complaint	3.50 230.00/hr	805.00
	SM	Review re: SSDI	0.10 230.00/hr	23.00
	GJV	E-mail	0.20 320.00/hr	64.00
9/7/2017	SM	Work on draft complaint; emails with GJV re: claims	3.10 230.00/hr	713.00
	GJV	Work on complaint	1.10 320.00/hr	352.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/10/2017	SM	Review GJV email re: False Claims Act and GJV memorandum re: final tasks for complaint	0.20 230.00/hr	46.00
	GJV	Work on complaint	1.30 320.00/hr	416.00
9/11/2017	SM	Revisions to draft complaint	2.00 230.00/hr	460.00
	SM	Meeting with client and GJV re: draft complaint	2.50 230.00/hr	575.00
	GJV	Conference with Dr. Porter and S. Merlo	2.50 320.00/hr	800.00
	GJV	Memorandum on mediation	0.20 320.00/hr	64.00
	GJV	Revise complaint	1.00 320.00/hr	320.00
9/12/2017	SM	Emails with client; review documents in disability file; review letter from ObGyn Alums re: REI program; revisions to complaint	1.00 230.00/hr	230.00
	GJV	Complaint	0.40 320.00/hr	128.00
	GJV	Review bylaws and consider argument about using bylaws to argue Dr. Porter had right to hearing	1.10 320.00/hr	352.00
9/13/2017	SM	Emails with client	0.10 230.00/hr	23.00
	GJV	Complaint and edit final version	1.40 320.00/hr	448.00
9/14/2017	SM	Revisions to draft complaint	1.20 230.00/hr	276.00
	GJV	Complaint	0.70 320.00/hr	224.00
9/21/2017	SM	Revisions to complaint; research re: jurisdiction and venue in USDC-VT	2.00 230.00/hr	460.00
9/22/2017	SM	Revise complaint for federal filing; email to GJV	0.20 230.00/hr	46.00
	SM	REview OT note provided by client	0.20 230.00/hr	46.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/25/2017	GJV Outline; t/c K. Troland; file memo	0.20 320.00/hr	64.00
9/26/2017	SM Emails	0.20 230.00/hr	46.00
	GJV E-mails	0.20 320.00/hr	64.00
	GJV Review final complaint in U.S. District court for Vermont and prepare memorandum on discovery and court	1.00 320.00/hr	320.00
	GJV E-mails	0.20 320.00/hr	64.00
	For professional services rendered	34.60	\$9,020.00
	Previous balance		\$14,165.58
9/13/2017	Payment - thank you. Check No. 4861		(\$14,165.58)
	Total payments and adjustments		(\$14,165.58)
	Balance due		<u>\$9,020.00</u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	11.80	320.00	\$3,776.00
Sarah Merlo	22.80	230.00	\$5,244.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

November 03, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-12137

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
10/2/2017	GJV	Outline for K. Troland and call K. Troland	0.20 320.00/hr	64.00
	GJV	E-mail to K. Troland	0.20 320.00/hr	64.00
10/3/2017	GJV	E-mails with M. Porter and K. Troland	0.10 320.00/hr	32.00
	GJV	Several emails with M. Porter and D. Schroeder	0.60 320.00/hr	192.00
10/4/2017	SN	Conf with GJV RE complaint	0.30 80.00/hr	24.00
	GJV	Conference with Tom and Misty Porter and email D. Schroeder	1.70 320.00/hr	544.00
	GJV	Prepare file memorandum	0.80 320.00/hr	256.00
10/5/2017	GJV	Review service of process question	0.30 320.00/hr	96.00
	GJV	Emails re: filing and cover sheet	0.30 320.00/hr	96.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/5/2017	SM	Emails with GJV re: D-H response; prepare complaint for filing	0.30 230.00/hr	69.00
10/9/2017	GJV	E-mail D. Schroeder	0.10 320.00/hr	32.00
10/10/2017	GJV	Conference with Tom and Misty Porter and review draft	1.40 320.00/hr	448.00
	GJV	E-mails with K. Kramer and review final draft	0.90 320.00/hr	288.00
	GJV	File memorandum	0.20 320.00/hr	64.00
	JK	Conference with G. Vitt re: Complaint filing, journalists, communications	0.20 100.00/hr	20.00
	JK	Research re: complaint filing and regional newspaper contacts	0.10 100.00/hr	10.00
	SM	Conf. and emails with client; revisions to complaint; draft civil cover sheet; research re: waiver of service;	1.10 230.00/hr	253.00
10/11/2017	GJV	E-mails M. Porter and consider service	0.20 320.00/hr	64.00
	GJV	Review several emails and t/c VN person	0.70 320.00/hr	224.00
	GJV	E-mails and revise Statement	0.40 320.00/hr	128.00
	JK	Hand-delivery: Complaint filed in US District Court, Burlington VT	3.00 100.00/hr	300.00
	JK	E-mails re: copy of Complaint to D. Schroeder and regional papers	0.80 100.00/hr	80.00
	SM	Revise complaint; research re: VT ethics rules for communication with the press; email to GJV; research re: de-identifying HIPAA-protected info and HIPAA-permitted disclosures	1.30 230.00/hr	299.00
10/12/2017	GJV	E-mails	0.20 320.00/hr	64.00
	SM	Emails	0.10 230.00/hr	23.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/13/2017	GJV Review email	0.10 320.00/hr	32.00
	SM Review letter from former residents to DH re: closure of REI	0.10 230.00/hr	23.00
10/14/2017	GJV E-mail S. Merlo re: VT rules on witness interviews	0.20 320.00/hr	64.00
	GJV E-mail S. Nunan re: setting up interviews	0.10 320.00/hr	32.00
10/16/2017	GJV E-mails with Dr. Porter and analysis of witnesses	1.00 320.00/hr	320.00
	JK Mail and E-mail re: D service acceptance, notice to D. Schroeder	0.30 100.00/hr	30.00
	SM Draft notice and waiver documents; draft letter to Schroeder; emails with GJV; review timeline for discovery	1.50 230.00/hr	345.00
10/17/2017	JK Reviewing news articles	1.00 100.00/hr	100.00
10/23/2017	SM Review waivers	0.10 230.00/hr	23.00
10/26/2017	JK E-mail Burlington Free Press	0.10 100.00/hr	10.00
10/30/2017	GJV . Prepare draft requests to produce to D-IH	0.40 320.00/hr	128.00
	For professional services rendered	20.40	\$4,841.00
	Additional Charges :		
10/10/2017	Filing fee:U,S District Court - Clerk		400.00
10/11/2017	Mileage expense:US District Court of Vermont		102.72
	Total costs		\$502.72
	Total amount of this bill		\$5,343.72
	Previous balance		\$9,020.00
9/10/2017	Payment - thank you. Check No. 4867		(\$9,020.00)

Misty Porter

Page 4

Amount

Total payments and adjustments

(\$9,020.00)

Balance due

\$5,343.72

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	10.10	320.00	\$3,232.00
Julia Korkus	5.50	100.00	\$550.00
Sarah Nunan	0.30	80.00	\$24.00
Sarah Merlo	4.50	230.00	\$1,035.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

December 08, 2017

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-12275

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2017	GJV	E-mails with Dr. Porter and review discovery requests	0.70 320.00/hr	224.00
11/2/2017	SN	Conf with GJV	0.70 80.00/hr	56.00
	GJV	Prepare draft discovery	1.20 320.00/hr	384.00
11/3/2017	GJV	Review file memorandum and prepare draft discovery	1.80 320.00/hr	576.00
	GJV	Review background documents and prepare discovery	0.60 320.00/hr	192.00
11/4/2017	GJV	Draft discovery	0.30 320.00/hr	96.00
	GJV	T/c R. Young and prepare file memorandum and email M. Porter	0.70 320.00/hr	224.00
11/6/2017	GJV	Revise requests to D-H	0.50 320.00/hr	160.00
11/7/2017	JK	Conference w/ G. Vitt and e-mail mtg response to press reporter.	0.20 100.00/hr	20.00

Vitt & Associates, PLC  
8 Beaver Meadow Road, PO Box 1229, Norwich, VT 05055 802-649-5700 ~ Fax 802-649-1692  
PO Box 349, Hanover, NH 03755 603-640-6173 [www.vittandassociates.com](http://www.vittandassociates.com)

Misty Porter

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
11/7/2017	JK Review GJV e-mail and D-H quotes to press and prepare memorandum	0.30 100.00/hr	30.00
	GJV E-mails	0.20 320.00/hr	64.00
	GJV E-mail	0.10 320.00/hr	32.00
	GJV Prepare requests to produce	0.70 320.00/hr	224.00
11/8/2017	JK Conference w/ G. Vitt & S. Nunan re: press communication & timing	0.10 100.00/hr	10.00
	SM Research re: NH law on ex parte communications with employees of represented party	0.10 230.00/hr	23.00
11/10/2017	JK Review and prepare RSA and Med rules for G. Vitt.	0.80 100.00/hr	80.00
	JK Conference with GJV re: interview interest from Burlington Free Press reporter	0.20 100.00/hr	20.00
	JK Emails with reporter Dan D'Ambrosio re: interview interest from Burlington Free Press	0.20 100.00/hr	20.00
	GJV Review emails and revise draft letter to NH Board	0.70 320.00/hr	224.00
	GJV E-mails	0.10 320.00/hr	32.00
	GJV E-mail Dr. Porter	0.10 320.00/hr	32.00
	GJV E-mails	0.10 320.00/hr	32.00
11/13/2017	GJV E-mails and review/edit reply to Board	0.30 320.00/hr	96.00
	GJV E-mail	0.10 320.00/hr	32.00
11/14/2017	GJV E-mails and outline for third party witnesses	0.20 320.00/hr	64.00
For professional services rendered		11.00	\$2,947.00

Misty Porter

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## Additional Charges :

	<u>Amount</u>
11/8/2017 Electronic research charges.	4.83
Total costs	<u>\$4.83</u>
Total amount of this bill	<u>\$2,951.83</u>
Previous balance	(\$291.28)
Balance due	<u><u>\$2,660.55</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	8.40	320.00	\$2,688.00
Julia Korkus	1.80	100.00	\$180.00
Sarah Nunan	0.70	80.00	\$56.00
Sarah Merlo	0.10	230.00	\$23.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

January 09, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2017-12357

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2017	GJV	Review complaint and prepare draft discovery requests	0.80 320.00/hr	256.00
12/4/2017	SM	Conf. with GJV re: response to NH Board of Medicine inquiry	0.10 230.00/hr	23.00
12/5/2017	KBK	Review letter from New Hampshire Board of Medicine and memorandum from Geoffrey Vitt and assess additional responses and questions	0.20 175.00/hr	35.00
	GJV	Conference with Misty and Tom Porter	1.30 320.00/hr	416.00
	GJV	E-mail	0.20 320.00/hr	64.00
	GJV	File memo	0.10 320.00/hr	32.00
12/7/2017	GJV	T/c Sally Garhart; prepare memorandum and email M. Porter	0.50 320.00/hr	160.00
	GJV	E-mail	0.10 320.00/hr	32.00
	JK	Conference with G. Vitt; Receive and review email re: NH Board of Medicine investigation and G. Vitt memo on Garhart conversation	0.50 100.00/hr	50.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/13/2017	KBK	Meeting with Geoffrey Vitt to discuss strategy and next steps	0.80 175.00/hr	140.00
	GJV	Conference with K. Burghardt Kramer re. discovery issues	1.00 320.00/hr	320.00
	JK	Conference with G. Vitt, S. Nunan, K. Kramer re: updates, next steps and planning. Review Letter from NH Board of Medicine and file correspondence	1.20 100.00/hr	120.00
	SN	Conf. with GJV, KBK, and JK RE status of litigation	0.30 80.00/hr	24.00
12/15/2017	KBK	Exchange emails with Geoffrey Vitt regarding New Hampshire medical board; review draft response by Misty Porter to NH Board of Medicine and provide feedback to Geoffrey Vitt regarding revisions	0.90 175.00/hr	157.50
	GJV	Review draft reply and review legal issues	0.70 320.00/hr	224.00
12/18/2017	KBK	Review answer from Dartmouth-Hitchcock	0.20 175.00/hr	35.00
	GJV	Review M. Porter and K. Burghardt Kramer emails and review Board letter and revise letter	0.60 320.00/hr	192.00
	JK	Review D-H Answer to Complaint	0.40 100.00/hr	40.00
12/19/2017	KBK	Exchange emails with Geoffrey regarding early neutral evaluation and potential mediators	0.20 175.00/hr	35.00
12/21/2017	KBK	Research potential ENE mediators; email to Geoffrey Vitt regarding mediators	0.30 175.00/hr	52.50
12/22/2017	GJV	Discovery	0.10 320.00/hr	32.00
12/30/2017	GJV	Discovery	0.20 320.00/hr	64.00
		For professional services rendered	10.70	\$2,504.00
		Previous balance		\$2,660.55
12/14/2017		Payment - thank you. Check No. 4913		(\$2,660.55)
		Total payments and adjustments		(\$2,660.55)

Misty Porter

Page 3

Amount

Balance due

\$2,504.00Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	5.60	320.00	\$1,792.00
Julia Korkus	2.10	100.00	\$210.00
Katherine B. Kramer	2.60	175.00	\$455.00
Sarah Nunan	0.30	80.00	\$24.00
Sarah Merlo	0.10	230.00	\$23.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

February 12, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12439

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
1/1/2018	GJV	Several emails and review proposed schedule	0.30 320.00/hr	96.00
1/2/2018	GJV	Review proposed Discovery Schedule; t/c K. Kramer and review language re: Production issue	0.80 320.00/hr	256.00
	GJV	Conference call K. Kramer and t/c K. Kramer	0.30 320.00/hr	96.00
	JK	Review ENE letter from Clerk Eaton; Review VT ENE program and process.	0.40 100.00/hr	40.00
	KBK	Review proposed discovery schedule; prepare for phone call with attorneys for Dartmouth-Hitchcock; phone call with Geoffrey Vitt regarding discovery schedule; telephone conference with Geoffrey Vitt, Daniel Long and Don Schroeder regarding discovery schedule; telephone conference with Geoffrey Vitt; review final proposed discovery schedule from Daniel Long and email regarding same	1.70 175.00/hr	297.50
	SN	Conf. with GJV RE Format of ESI request for discovery	0.20 80.00/hr	16.00
	SN	Researched language for discovery order RE ESI, gave to GJV	1.10 80.00/hr	88.00
1/4/2018	GJV	E-mail D-H lawyer	0.10 320.00/hr	32.00

Misty Porter

Page 2

			<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2018	GJV	Several emails and prepare ENE Stipulation	0.30 320.00/hr	96.00
1/6/2018	GJV	Prepare Discovery to D-H	1.30 320.00/hr	416.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery and issues regarding contacting present and former Dartmouth-Hitchcock employees	0.40 175.00/hr	70.00
	KBK	Exchange emails wiht G. Vitt regarding discovery and issues regarding contacting present and former Dartmouth-Hitchcock employees	0.40 175.00/hr	70.00
1/7/2018	GJV	Discovery to D-H	1.10 320.00/hr	352.00
1/8/2018	JK	Receive and review K. Kramer draft of P's First Set of Interrogatories and Requests to Produce	0.80 100.00/hr	80.00
	JK	Receive & review K. Kramer & G. Vitt mediation e-mails & draft of discovery requests	0.70 100.00/hr	70.00
	JK	Review Dr. Porter file emails re: colleagues, witness details	0.80 100.00/hr	80.00
	GJV	Discovery	0.30 320.00/hr	96.00
	GJV	Discovery to D-H	1.80 320.00/hr	576.00
	KBK	Draft discovery requests	5.00 175.00/hr	875.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery and mediation	0.30 175.00/hr	52.50
1/9/2018	JK	Review & prepare summary of references for G. Vitt re: D-H statements on profitability of REI	1.60 100.00/hr	160.00
	GJV	Prepare requests to D-H	1.20 320.00/hr	384.00
1/10/2018	JK	Review & prepare summary of references for G. Vitt re: D-H statements on decisions to close REI	1.70 100.00/hr	170.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery	0.20 175.00/hr	35.00
	GJV	Review requests to D-H	1.20 320.00/hr	384.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2018	KBK	Receive and review email from Geoffrey Vitt regarding discovery requests	0.10 175.00/hr	17.50
	GJV	E-mails with K. Kramer and revise requests	0.40 320.00/hr	128.00
	GJV	Discovery to D-H	1.50 320.00/hr	480.00
1/12/2018	KBK	Revise discovery requests	1.20 175.00/hr	210.00
1/14/2018	KBK	Edit and revise discovery requests; email to Geoffrey Vitt regarding edits and revisions	1.50 175.00/hr	262.50
	GJV	Discovery including revisions to requests	2.30 320.00/hr	736.00
1/15/2018	KBK	Phone call with Geoffrey Vitt regarding discovery requests	0.80 175.00/hr	140.00
	KBK	Revise document discovery requests	1.30 175.00/hr	227.50
	GJV	T/c K. Kramer and review requests	0.80 320.00/hr	256.00
1/16/2018	JK	Meeting w/ S. Nunan & review of initial disclosures background	0.60 100.00/hr	60.00
	JK	Review names and content for initials disclosures draft	2.40 100.00/hr	240.00
	JK	Review federal and local procedures re: Rule 26	0.70 100.00/hr	70.00
	KBK	Revise document discovery requests	2.70 175.00/hr	472.50
	GJV	Several emails	0.20 320.00/hr	64.00
	GJV	Initial disclosures	0.20 320.00/hr	64.00
	SN	Email sample document to JK; Conf. with JK RE initial disclosures	0.50 80.00/hr	40.00
1/17/2018	JK	Prepare draft of initial disclosures; research & update witness/contacts info	4.20 100.00/hr	420.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2018	KBK	Research ethical implications of contacting current and former D-H employees and begin preparing memo	1.10 175.00/hr	192.50
	GJV	Agenda and review discovery	0.90 320.00/hr	288.00
	GJV	Memo on discovery agenda and review requests	1.00 320.00/hr	320.00
	GJV	Discovery to D-H	0.80 320.00/hr	256.00
1/18/2018	JK	E-mail from G. Vitt; review and edit timeline/events	2.20 100.00/hr	220.00
	KBK	Prepare for meeting with Misty Porter and Geoffrey Vitt; meeting with Misty Porter and Geoffrey Vitt at UVMMC	1.60 175.00/hr	280.00
	KBK	Round trip travel to Burlington for meeting with Misty and Geoffrey	2.00 175.00/hr	350.00
	KBK	Review draft initial disclosures; research ethics issue regarding contacting D-H employees; revise memo regarding ethics of contacting D-H employees and send memo to Geoffrey Vitt; exchange emails with Misty Porter regarding discovery	1.90 175.00/hr	332.50
	GJV	Conf. Dr. Porter and K. Kramer; review discovery; conf. K. Kramer re. discovery and theories of recovery	3.80 320.00/hr	1,216.00
1/19/2018	JK	Review G. Vitt edits and revise Plaintiff's Initial Disclosures document	1.80 100.00/hr	180.00
	JK	Revise initial disclosures per e-mail from G. Vitt	1.30 100.00/hr	130.00
	JK	Phone call and email w/ Dr. Porter re: set up mtg & phone copy details	0.20 100.00/hr	20.00
	KBK	Exchange emails with Misty Porter and Geoffrey Vitt regarding additional discovery requests, medical billing fraud, and fertility rates; prepare and file notice of appearance; revise discovery document requests per additional suggestions from Misty Porter	0.90 175.00/hr	157.50
1/20/2018	KBK	Prepare memo regarding litigation strategy	0.90 175.00/hr	157.50
	GJV	Review requests and email and revise requests	1.30 320.00/hr	416.00
1/21/2018	GJV	Review K. Kramer email and revise requests	0.40 320.00/hr	128.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/22/2018	JK	Meeting w/ Dr. Porter to receive iphone/ipad text matter material	0.70 100.00/hr	70.00
	JK	Review/receive/transfer iphone & ipad text material	3.20 100.00/hr	320.00
	JK	Receive & review SART e-mail from Dr. Porter; confirm correction	0.30 100.00/hr	30.00
	JK	Conference w/ G. Vitt re: initial disclosures	0.50 100.00/hr	50.00
	JK	Revise final initial disclosures draft	0.40 100.00/hr	40.00
	JK	E-mail response to G. Vitt re: initial disclosures comments & questions	0.20 100.00/hr	20.00
	GJV	Initial Disclosures	0.30 320.00/hr	96.00
	GJV	Additional discovery	0.30 320.00/hr	96.00
1/23/2018	JK	Conference w/ G. Vitt re: Porter evidence and planning	0.50 100.00/hr	50.00
	JK	Review iphone text messages	2.40 100.00/hr	240.00
	KBK	Review and edit final draft of initial disclosures	0.60 175.00/hr	105.00
	KBK	Receive and review initial disclosures from D-H	0.20 175.00/hr	35.00
	GJV	Initial disclosures and conf. J. Korkus	0.20 320.00/hr	64.00
	GJV	Review timeline	0.20 320.00/hr	64.00
1/24/2018	JK	E-mail & resolve w/ Dr. Porter phone question	0.20 100.00/hr	20.00
	JK	Review iphone/ipad text messages	3.20 100.00/hr	320.00
	JK	Receive & review Defendants' Initial Disclosures	0.70 100.00/hr	70.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2018	KBK Draft memo regarding litigation strategy	0.50 175.00/hr	87.50
1/25/2018	JK Review iphone/ipad text message	4.20 100.00/hr	420.00
	KBK Receive email from Misty Porter regarding UVM residency program	0.10 175.00/hr	17.50
	KBK Telephone conference with Geoffrey Vitt	0.30 175.00/hr	52.50
	GJV E-mails	0.20 320.00/hr	64.00
	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV E-mail	0.10 320.00/hr	32.00
1/26/2018	JK Review iphone/ipad messages	1.20 100.00/hr	120.00
1/29/2018	JK File management & preparation for production	0.80 100.00/hr	80.00
	KBK Draft memo regarding litigation strategy	1.60 175.00/hr	280.00
1/30/2018	JK Review K. Kramer email & memo re: strategy & witness/evidence organization	0.50 100.00/hr	50.00
	KBK Revise strategy memo and send to Geoffrey Vitt; exchange emails regarding witness interviews	0.50 175.00/hr	87.50
1/31/2018	KBK Exchange emails with Misty Porter regarding former patients to interview; prepare chart of individuals to interview based upon list provided by Misty, initial disclosures, and other documents; email to Geoffrey Vitt regarding individuals to interview and general strategy	3.70 175.00/hr	647.50
	GJV E-mail	0.10 320.00/hr	32.00
For professional services rendered		95.60	\$17,144.50
Additional Charges :			
1/18/2018	Parking-UVM Medical Ctr		3.75

Misty Porter

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	<u>Amount</u>
Total costs	\$3.75
Total amount of this bill	\$17,148.25
Previous balance	\$2,504.00
1/18/2018 Payment - thank you. Check No. 4918	(\$2,504.00)
Total payments and adjustments	(\$2,504.00)
Balance due	\$17,148.25

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	23.90	320.00	\$7,648.00
Julia Korkus	38.40	100.00	\$3,840.00
Katherine B. Kramer	31.50	175.00	\$5,512.50
Sarah Nunan	1.80	80.00	\$144.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

March 13, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12507

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2018	KBK	Review email from Misty Porter with job description documents; email to Misty Porter regarding reassignment questions	0.50 175.00/hr	87.50
2/6/2018	KBK	Organize chart of individuals to interview; email to Geoffrey Vitt and Julia Korkus regarding interviews	0.30 175.00/hr	52.50
	JK	Receive email from K. Kramer and review interview chart	0.70 100.00/hr	70.00
2/12/2018	KBK	Telephone conference with Geoffrey Vitt regarding interviews of D-H employees	0.20 175.00/hr	35.00
2/13/2018	KBK	Email to Misty Porter regarding motion for ex parte communications with D-H employees	0.20 175.00/hr	35.00
	KBK	Receive and review email from Misty Porter regarding merger between Alice Peck Day Hospital and D-H obstetrics	0.10 175.00/hr	17.50
	KBK	Draft motion for permission to contact D-H employees ex parte under Rule 4.2	4.80 175.00/hr	840.00
	GJV	Several emails with K. Kramer re: witness contact	0.20 320.00/hr	64.00
	GJV	Review email and issues re: Rule 4.2	0.30 320.00/hr	96.00



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2018	KBK	Research and draft motion for ex parte communications with D-H employees	4.80 175.00/hr	840.00
2/15/2018	KBK	Draft and research motion for permission to conduct ex parte interviews; email draft to Geoffrey Vitt	5.50 175.00/hr	962.50
	KBK	Telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
2/16/2018	KBK	Exchange emails with Geoffrey Vitt regarding damages experts and other issues; investigate possible damages experts	0.40 175.00/hr	70.00
	KBK	Email to Don Schroeder and Daniel Long following up on Rule 4.2 inquiry	0.10 175.00/hr	17.50
	GJV	Review draft motion	0.30 320.00/hr	96.00
2/17/2018	GJV	Review draft motion re: Rule 4.2 and email K. Kramer re: changes and witness interviews	0.70 320.00/hr	224.00
2/19/2018	KBK	Receive and review email from Misty Porter regarding Leslie DeMars	0.10 175.00/hr	17.50
	KBK	Prepare for phone call with Geoffrey Vitt regarding next steps; phone call with Geoffrey Vitt	1.50 175.00/hr	262.50
	KBK	Revise motion for ex parte contact with D-H employees	3.20 175.00/hr	560.00
	KBK	Exchange emails with Geoffrey Vitt regarding motion for ex parte contact	0.10 175.00/hr	17.50
	GJV	T/c K. Kramer and prepare memorandum and conf. J. Korkus re: document organization	1.50 320.00/hr	480.00
	GJV	Review final draft and comment; email K. Kramer	0.40 320.00/hr	128.00
2/20/2018	KBK	Proofread and finalize motion for ex parte interviews with D-H employees	0.50 175.00/hr	87.50
	JK	Review Motion for permission to contact D-H employees	0.40 100.00/hr	40.00
	JK	Review complaint	0.80 100.00/hr	80.00
	GJV	E-mails re: motion and argument	0.20 320.00/hr	64.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2018	GJV	Motion re: ex parte contact	0.20 320.00/hr	64.00
2/21/2018	JK	Review D's response to request for production of docs	0.80 100.00/hr	80.00
	JK	Emails w/ GJV	0.10 100.00/hr	10.00
	GJV	Review D-H responses to requests to produce and several emails with K. Kramer	0.70 320.00/hr	224.00
2/22/2018	GJV	Revise requests	1.80 320.00/hr	576.00
2/23/2018	KBK	Review document discovery responses from Dartmouth-Hitchcock; exchange emails with Misty Porter regarding UVM/D-H residency program; review emails from Geoffrey Vitt to Don Schroeder and Daniel Long regarding document production and discovery responses	0.70 175.00/hr	122.50
	JK	Prepare summary of Merrens statements for GJV.	0.90 100.00/hr	90.00
	GJV	Review defendants' objections to requests and prepare email to Long and Schroeder	0.80 320.00/hr	256.00
	GJV	Review Merrill quotes and email D-H lawyers`	0.20 320.00/hr	64.00
2/26/2018	KBK	Telephone conference with Geoffrey Vitt regarding discovery and D-H's objections/non-responses to our document discovery requests	0.20 175.00/hr	35.00
	KBK	Draft letter to Don Schroeder and Dan Long regarding discovery dispute over document requests	1.70 175.00/hr	297.50
	KBK	Review email from Geoffrey Vitt to Don Schroeder and Daniel Long regarding discovery dispute	0.10 175.00/hr	17.50
	JK	Reading Defendants Responses per doc production	0.80 100.00/hr	80.00
	GJV	T/c K. Kramer and new Dartmouth answers	0.30 320.00/hr	96.00
	GJV	E-mail D. Schroeder et al.	0.20 320.00/hr	64.00
2/27/2018	KBK	Exchange emails with Geoffrey Vitt regarding letter to D-H attorneys about discovery requests	0.10 175.00/hr	NO CHARGE

Misty Porter

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/27/2018 GJV E-mails with K. Kramer	0.10 320.00/hr	32.00
2/28/2018 KBK Draft letter to Don Schroeder and Dan Long about discovery objections to initial document requests and requesting revised responses	1.40 175.00/hr	245.00
For professional services rendered	39.10	\$7,633.00
Previous balance		\$17,148.25
2/15/2018 Payment - thank you. Check No. 4929		(\$17,178.25)
Total payments and adjustments		(\$17,178.25)
Balance due		<u>\$7,603.00</u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	7.90	320.00	\$2,528.00
Julia Korkus	4.50	100.00	\$450.00
Katherine B. Kramer	26.60	175.00	\$4,655.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

April 04, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12570

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
3/1/2018	GJV E-mail D. Schroeder and D. Long	0.10 320.00/hr	32.00
	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV Review draft letter to D. Schroeder and D. Long	0.20 320.00/hr	64.00
	KBK Telephone conference with Geoffrey Vitt regarding letter to Don Schroeder and Dan Long regarding document requests	0.20 175.00/hr	35.00
	KBK Revise letter to Schroeder and Long regarding document requests	1.70 175.00/hr	297.50
3/2/2018	GJV E-mails	0.20 320.00/hr	64.00
3/5/2018	GJV E-mails with D. Schroeder	0.10 320.00/hr	32.00
	KBK Receive and review email from Misty Porter regarding pediatric care unit at D-H	0.10 175.00/hr	17.50
3/6/2018	GJV T/c K. Kramer re: D. Schroeder response; emails and call E. Jones re: experts	0.30 320.00/hr	96.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2018	GJV	E-mails with D. Schroeder	0.10 320.00/hr	32.00
	KBK	Email to Geoffrey Vitt regarding conferring with Don Schroeder and Dan Long regarding discovery disputes; check docket to confirm whether Schroeder and Long filed pro hac vice applications	0.20 175.00/hr	35.00
	KBK	Telephone conference with Geoffrey Vitt regarding discovery issues and expert witnesses	0.20 175.00/hr	35.00
	KBK	Receive emails from Don Schroeder regarding scheduling a phone call about discovery objections; exchange emails with Geoffrey Vitt regarding phone call with Don Schroeder	0.20 175.00/hr	35.00
3/7/2018	GJV	T/c K. Kramer and prepare for conf. call	0.40 320.00/hr	128.00
	GJV	Conference call with D. Schroeder, D. Long, K. Kramer, J. Korkus and review notes	0.60 320.00/hr	192.00
	GJV	Conference call D. Schroeder, D. Long, K. Kramer, J. Korkus	1.40 320.00/hr	448.00
	JK	Prepare and meeting with V&A and D-H counsel	0.80 100.00/hr	80.00
	JK	Meeting #2 with V&A and D-H counsel re: discovery dispute; conf. w/ G. Vitt and K. Kramer	1.70 100.00/hr	170.00
	JK	Prepare mtg. memo	0.90 100.00/hr	90.00
	KBK	Review D-H's response to Rule 4.2 motion to contact D-H employees ex parte and begin preparing reply brief	0.70 175.00/hr	122.50
	KBK	Prepare for phone call with Don Schroeder, Daniel Long and Geoffrey Vitt regarding discovery disputes	0.40 175.00/hr	70.00
	KBK	Telephone conference with Geoffrey Vitt regarding discovery call with Don Schroeder and Daniel Long	0.20 175.00/hr	35.00
	KBK	Telephone conference regarding discovery disputes with Don Schroeder, Dan Long, and Geoffrey Vitt	0.40 175.00/hr	70.00
	KBK	Telephone conference with Geoffrey Vitt after call with Don Schroeder and Dan Long	0.20 175.00/hr	35.00
	KBK	Prepare for second phone call with Don Schroeder, Dan Long, and Geoffrey Vitt	0.20 175.00/hr	35.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/7/2018	KBK Second telephone conference with Don Schroeder, Dan Long, and Geoffrey Vitt regarding discovery dispute	1.20 175.00/hr	210.00
	KBK Telephone conference with Geoffrey Vitt after second call with Don Schroeder and Dan Long	0.20 175.00/hr	35.00
3/9/2018	KBK Draft reply to motion for ex parte interview under Rule 4.2	2.50 175.00/hr	437.50
	KBK Review proposed protective order from Daniel Long and email Geoffrey Vitt with comments on proposed protective order	0.60 175.00/hr	105.00
3/12/2018	GJV Review proposed Confidentiality Order and email K. Kramer	0.50 320.00/hr	160.00
	GJV Review D-H response to Dr. Porter's requests and several emails with K. Kramer re: motion and confidentiality issue	0.90 320.00/hr	288.00
	JK Updating spreadsheet	3.20 100.00/hr	320.00
	KBK Draft reply to Rule 4.2 motion for ex parte informal interviews	3.20 175.00/hr	560.00
	KBK Exchange emails with Geoffrey Vitt regarding proposed confidentiality order; review revised discovery response from Don Schroeder and Dan Long; exchange emails with Geoffrey Vitt regarding same; email to Dan Long and Don Schroeder requesting redline comparison of discovery responses	1.20 175.00/hr	210.00
3/13/2018	GJV E-mails with K. Kramer and review Dartmouth response to requests	0.30 320.00/hr	96.00
	GJV Review D-H interrogatories and prepare draft of interrogatories to D-H; memo to K. Kramer; Rule 30(b)(6) issue and review and edit memorandum	1.60 320.00/hr	512.00
	JK Compare discovery responses from D-H	1.70 100.00/hr	170.00
	JK Emails w/ KBK	0.20 100.00/hr	20.00
	KBK Email Geoffrey Vitt regarding discovery sanctions; revise proposed protective order to reflect different procedure for filing motions containing confidential information	0.60 175.00/hr	105.00
	KBK Review redline comparison of discovery responses from Don Schroeder and Dan Long; email to Julia Korkus and Geoffrey Vitt regarding same; review discovery requests from D-H to Misty Porter; email to Misty Porter regarding discovery requests from D-H	0.50 175.00/hr	87.50



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		<u>Hrs/Rate</u>	<u>Amount</u>
3/13/2018	KBK Revise reply brief to Rule 4.2 motion for ex parte interviews and send draft to Geoffrey Vitt for final review	2.80 175.00/hr	490.00
	KBK Review interrogatories propounded by Mary Hitchcock Memorial Hospital and Dartmouth-Hitchcock Medical Center and forward to Misty Porter	0.30 175.00/hr	52.50
3/14/2018	GJV Several emails	0.20 320.00/hr	64.00
	GJV Conf. K. Kramer re: confidentiality order and discovery to M. Porter	0.30 320.00/hr	96.00
	GJV Conf. K. Kramer and review draft interrogatories	0.80 320.00/hr	256.00
	JK Conf. w/ G. Vitt matter planning	0.30 100.00/hr	30.00
	KBK Revise and finalize reply brief to motion for ex parte interviews	0.20 175.00/hr	35.00
	KBK Draft motion to compel document request regarding Leslie DeMars	2.00 175.00/hr	350.00
	KBK Meeting with Geoffrey Vitt regarding confidentiality order and discovery issues	0.50 175.00/hr	87.50
	KBK Revise confidentiality order and send revised version to Don Schroeder and Dan Long	0.50 175.00/hr	87.50
	KBK Prepare interrogatory requests to be propounded on DHMC	0.70 175.00/hr	122.50
	KBK Meeting with Geoffrey Vitt and Julia Korkus regarding discovery	0.70 175.00/hr	122.50
3/15/2018	JK Emails from K. Kramer re: motion to compel	0.20 100.00/hr	20.00
	GJV T/C EDJ re: possible experts; email A. Manitsky re: experts; email K. Kramer re: experts and email Dr. Porter	0.30 320.00/hr	96.00
	GJV E-mails with K. Kramer, D. Schroeder and D. Long	0.20 320.00/hr	64.00
	GJV Review discovery fro D-H and outline response to requests	0.70 320.00/hr	224.00
	GJV Work on interrogatories	1.00 320.00/hr	320.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/15/2018	SN Reviewed language RE ESI discovery and emailed to GJV, KBK and JK	0.30 80.00/hr	24.00
	KBK Exchange emails with Don Schroeder regarding motion to compel; exchange emails with Geoffrey Vitt regarding expert witnesses	1.00 175.00/hr	175.00
	KBK Exchange emails with Misty Porter regarding treating doctors at D-H for her disability	0.20 175.00/hr	35.00
3/16/2018	GJV Interrogatories to D-H	1.40 320.00/hr	448.00
	KBK Review and revise draft interrogatories to be propounded on DHMC	0.80 175.00/hr	140.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery issues	0.70 175.00/hr	122.50
	KBK Exchange emails with Dan Long, Don Schroeder and Geoffrey Vitt regarding confidentiality agreement	0.10 175.00/hr	17.50
	KBK Begin drafting responses to discovery requests from D-H; revise interrogatory responses; briefly review document production from Dartmouth-Hitchcock	1.30 175.00/hr	227.50
3/17/2018	GJV Review interrogatories to D-H; draft answers to interrogatories and draft responses to request to produce	1.70 320.00/hr	544.00
	KBK Review discovery requests and begin preparing answers; email to Geoffrey Vitt, Julia Korkus and Liz Bower in preparation for Monday's meeting	0.90 175.00/hr	157.50
3/18/2018	JK Review of new documents	2.90 100.00/hr	290.00
	GJV Review draft responses to requests to admit; review interrogatories to D-H and review outlines for answers	1.70 320.00/hr	544.00
	KBK Review memo from Geoffrey Vitt regarding interrogatories; review Misty Porter's draft responses to requests to admit; email to Geoffrey Vitt regarding discovery strategy; email to Misty Porter regarding responses to requests to admit	0.90 175.00/hr	157.50
3/19/2018	JK Phone call w/ D-H counsel and KBK re: discovery dispute	0.80 100.00/hr	80.00
	JK Conf. w/ KBK re: motion to compel, production	0.20 100.00/hr	20.00
	JK Document review re: discovery & contacts to subpoena; emails w/ Dr. Porter.	2.40 100.00/hr	240.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
3/19/2018	JK New documents review	2.20 100.00/hr	220.00
	GJV Prepare for meeting	0.20 320.00/hr	64.00
	GJV Conference with K. Kramer, Dr. Porter, and J. Korkus to review draft answers	3.20 320.00/hr	1,024.00
	GJV E-mails with Dr. Porter	0.30 320.00/hr	96.00
	KBK Travel to Norwich	1.50 175.00/hr	262.50
	KBK No-charge balance of travel time to Norwich	1.50 175.00/hr	NO CHARGE
	KBK Meeting with Misty Porter, Geoffrey Vitt and Julia Korkus to review discovery responses by Misty and interrogatories to be propounded on DHMC	2.70 175.00/hr	472.50
	KBK Prepare for meeting with Misty Porter, Geoffrey Vitt and Julia Korkus regarding discovery	0.20 175.00/hr	35.00
	KBK Prepare for phone call with D. Schroeder and Dan Long regarding document production request regarding Dr. DeMars and confidentiality order	0.20 175.00/hr	35.00
	KBK Call to Dan Long and Don Schroeder regarding discovery requests and proposed confidentiality order with Julia Korkus; brief follow-up meeting with Julia Korkus regarding phone call	0.70 175.00/hr	122.50
	KBK Finalize Plaintiff's First Set of Interrogatories against DHMC; draft and revise Misty Porter's response to D-H's first set of requests for admission	0.70 175.00/hr	122.50
	KBK Prepare for call to Bob Bancroft (economic expert); call with Bob Bancroft and Geoffrey Vitt regarding availability as expert witness	0.60 175.00/hr	105.00
	KBK Meeting with Julia Korkus regarding discovery	0.20 175.00/hr	35.00
3/20/2018	JK Review discovery issues	2.10 100.00/hr	210.00
	JK Review health records	1.20 100.00/hr	120.00
	GJV E-mails	0.10 320.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/20/2018	KBK	Review revised confidentiality order from Dan Long; revise joint motion for protective order; email to Dan Long and Don Schroeder regarding same	0.30 175.00/hr	52.50
	KBK	Review list of individuals for obtaining personal documents by subpoena or request; email to Geoffrey Vitt regarding same; search Facebook for articles in Valley News and NH Union Leader with comments about Misty Porter and closing REI Division	1.50 175.00/hr	262.50
	KBK	Prepare memo to file regarding meeting with Misty Porter and Geoffrey Vitt on March 29, 2018; circulate to Geoffrey Vitt and Julia Korkus	1.00 175.00/hr	175.00
3/21/2018	JK	Document review re: DeMars support of MBP & chair changes	2.40 100.00/hr	240.00
	JK	Emails w/ MBP	0.40 100.00/hr	40.00
	GJV	Revise letter	0.10 320.00/hr	32.00
	KBK	Draft motion to compel documents regarding Leslie DeMars ceasing to be chair of OB/GYN	3.30 175.00/hr	577.50
	KBK	Exchange emails with Julia Korkus regarding documents related to ouster of Leslie DeMars as chair; review documents regarding ouster of Leslie DeMars as chair	0.60 175.00/hr	105.00
3/22/2018	JK	New documents review	3.70 100.00/hr	370.00
	JK	Prepare response to Int.	2.20 100.00/hr	220.00
	GJV	Review draft motion to compel	0.20 320.00/hr	64.00
	GJV	T/c K. Kramer	0.30 320.00/hr	96.00
	KBK	Revise motion to compel documents regarding Leslie DeMars and email draft to Geoffrey Vitt and Julia Korkus	1.50 175.00/hr	262.50
	KBK	Telephone conference with Geoffrey Vitt regarding subpoenas and motion to compel	0.20 175.00/hr	35.00
3/23/2018	JK	New emails from Dr. Porter - review documents	3.60 100.00/hr	360.00
	JK	Edits to draft Int.	1.70 100.00/hr	170.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2018	GJV	Review K. Kramer email and response to D. Schroeder	0.20 320.00/hr	64.00
	KBK	Research use of subpoena for obtaining personal emails from employees of a corporate defendant; email to Don Schroeder and Dan Long regarding subpoenas for personal emails, text messages, and social media posts and messages from various D-H employees	0.50 175.00/hr	87.50
	KBK	Telephone conference with Judge Crawford's chambers regarding oral argument on Rule 4.2 motion	0.10 175.00/hr	17.50
3/24/2018	GJV	Review draft motion to compel; prepare memorandum on motion to compel; resignation of Dr. DeMars, status of discovery and subpoenas	1.30 320.00/hr	416.00
	GJV	Subpoena for Dr. Leslie DeMars	0.40 320.00/hr	128.00
3/25/2018	GJV	Subpoenas to D-H employees	1.40 320.00/hr	448.00
3/26/2018	JK	Conf. w/ G. Vitt re: witness, REI budget, Rkm mtg plan	0.10 100.00/hr	10.00
	JK	Documents review	2.70 100.00/hr	270.00
	JK	Review motion to compel	0.40 100.00/hr	40.00
	JK	Research re: chair terms and emails w/ K. Kramer	0.70 100.00/hr	70.00
	GJV	Review and edit motion to compel	0.80 320.00/hr	256.00
	GJV	Review email	0.10 320.00/hr	32.00
	KBK	Receive and review emails from Geoffrey Vitt and Misty Porter regarding additional factual information for use in motion to compel documents regarding Leslie DeMars	0.60 175.00/hr	105.00
	KBK	Prepare and send email to Dan Long and Don Schroeder regarding status of document production and failure to produce documents promptly	0.30 175.00/hr	52.50
	KBK	Revise motion to compel documents regarding Leslie DeMars ceasing to be chair and incorporate additional information into factual background section of motion	2.40 175.00/hr	420.00
3/27/2018	JK	New client documents review from Dr. Porter	3.20 100.00/hr	320.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/27/2018	JK Email from Dr. Porter	0.30 100.00/hr	30.00
	GJV Review draft motion to compel	0.20 320.00/hr	64.00
	KBK Final proofread of motion to compel	0.50 175.00/hr	NO CHARGE
	KBK Receive and review emails from Misty Porter regarding ultrasound training for medical residents	0.20 175.00/hr	NO CHARGE
3/28/2018	GJV E-mails	0.20 320.00/hr	64.00
	GJV Several emails with K. Kramer; review ENE issue	0.20 320.00/hr	64.00
	GJV Review specifications for subpoena to Dr. Merrens	0.30 320.00/hr	96.00
	GJV Several emails with K. Kramer and review emails with D. Schroeder re: document production and subpoenas	0.30 320.00/hr	96.00
	GJV T/c D. Schroeder and emails	0.20 320.00/hr	64.00
	GJV T/c K. Kramer re: subpoenas to D-H witnesses and problems with D-H document production	0.20 320.00/hr	64.00
	GJV Subpoenas to Dr. Merrens and Dr. DeMars	0.30 320.00/hr	96.00
	GJV Subpoenas to Dr. Merrens, Dr. DeMars, and 5 other D-H employees; review service issue with subpoenas	1.40 320.00/hr	448.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery issues and amending discovery schedule	0.20 175.00/hr	35.00
	KBK Exchange multiple emails with Don Schroeder and Dan Long about slow pace of document production	0.20 175.00/hr	35.00
	KBK Telephone conference with Geoffrey Vitt regarding email exchange with Don Schroeder regarding document production and other issues	0.20 175.00/hr	35.00
	KBK Telephone conference with Geoffrey Vitt regarding conversation with Don Schroeder and discovery issues	0.20 175.00/hr	35.00
	KBK Research quality assurance privilege as applied to Dartmouth-Hitchcock's production of documents	0.50 175.00/hr	NO CHARGE

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2018	KBK Review draft discovery responses; exchange emails with Geoffrey Vitt regarding discovery; review emails from Misty Porter regarding discovery	0.20 175.00/hr	35.00
3/29/2018	GJV Conf. Dr. Porter, K. Kramer re: responses to requests to admit and answers to interrogatories	2.80 320.00/hr	896.00
	GJV File memorandum on issues re: answers to interrogatories and review subpoenas to Dr. Merrens and other D-H employees	1.60 320.00/hr	512.00
	KBK Meeting with Misty Porter and Geoffrey Vitt to prepare interrogatory responses	2.50 175.00/hr	437.50
	KBK Briefly review proposed attachments to draft subpoenas from Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK Travel to Norwich for meeting with Misty Porter and Geoffrey Vitt	1.50 175.00/hr	262.50
	KBK Remainder of travel time for meeting with Misty Porter and Geoffrey Vitt	1.50 175.00/hr	NO CHARGE
3/30/2018	GJV Review draft answers to interrogatories and consider additional requests to D-H	2.60 320.00/hr	832.00
	GJV Letter to D. Schroeder	0.20 320.00/hr	64.00
	KBK Review and revise lists of document request for subpoenas to be issued for Ed Merrens and Leslie DeMars	0.70 175.00/hr	122.50
	KBK Exchange emails with Misty Porter regarding attorney-client privilege	0.20 175.00/hr	35.00
	KBK Receive and review emails from Don Schroeder regarding subpoenas and deposition notice for Misty Porter	0.20 175.00/hr	35.00
3/31/2018	GJV Review D. Schroeder email and email K. Kramer	0.20 320.00/hr	64.00
	For professional services rendered	134.80	\$24,664.00
	Previous balance		\$7,603.00
	3/20/2018 Payment - thank you. Check No. 5086		(\$7,603.00)
	Total payments and adjustments		(\$7,603.00)
	Balance due		<u>\$24,664.00</u>

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<u>Name</u>	<u>Lawyer/paralegal Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt		34.50	320.00	\$11,040.00
Julia Korkus		42.20	100.00	\$4,220.00
Katherine B. Kramer		53.60	175.00	\$9,380.00
Sarah Nunan		0.30	80.00	\$24.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

May 08, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12649

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
4/2/2018	KBK	Telephone conference with Geoffrey Vitt regarding document production, deposition of Misty Porter, and other issues	0.20 175.00/hr	35.00
	KBK	Email to Misty Porter regarding scope of attorney-client privilege and application to email communications	0.20 175.00/hr	35.00
	KBK	Review and revise document requests for subpoenas to be served on Herrick, Gunnell, Mansfield and Padin	0.70 175.00/hr	122.50
	GJV	Response to subpoenas	0.40 320.00/hr	128.00
4/3/2018	GJV	Emails with K. Kramer and review D. Schroeder email re: issues with production of documents	0.50 320.00/hr	160.00
	JK	Review correspondence & 2nd set of production	3.60 100.00/hr	360.00
	JK	Emails from K. Kramer re: discovery responses and production review	0.20 100.00/hr	20.00
	KBK	Brief review of new production of documents from Dartmouth-Hitchcock	0.80 175.00/hr	140.00
	KBK	Telephone conference with Geoffrey Vitt regarding deposition of Misty Porter and other issues	0.10 175.00/hr	17.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/3/2018	KBK Email to Misty Porter regarding notice of her deposition	0.10 175.00/hr	17.50
	KBK Email to Misty Porter with information about subpoenas for personal documents	0.10 175.00/hr	17.50
	KBK Telephone conference with Misty Porter regarding litigation status and next steps	0.30 175.00/hr	52.50
	KBK Email to Geoffrey Vitt and Julia Korkus regarding discovery	0.20 175.00/hr	35.00
4/4/2018	JK Email from M. Porter	0.10 100.00/hr	10.00
	JK Phone conf. w/ K. Kramer re: discovery	0.40 100.00/hr	40.00
	JK Review draft response to request for production	0.60 100.00/hr	60.00
	JK Review and prepare production documents	3.40 100.00/hr	340.00
	JK Review new documents received from Misty Porter	0.80 100.00/hr	80.00
	KBK Telephone conference with Julia Korkus about discovery	0.40 175.00/hr	70.00
	KBK Revise response to requests to produce; leave voicemail for Don Schroeder and Dan Long regarding document production; email to Don Schroeder and Dan Long regarding document production	1.30 175.00/hr	227.50
	KBK Further revise response to requests to produce	0.60 175.00/hr	105.00
4/5/2018	JK Prepare production for review by K. Kramer	4.20 100.00/hr	420.00
	JK Review new documents received from Misty Porter	1.10 100.00/hr	110.00
	KBK Exchange emails with Don Schroeder and Dan Long regarding discovery production	0.20 175.00/hr	35.00
4/6/2018	JK Email w/ K. Kramer re: production request and discovery sources - taxes, damages	0.10 100.00/hr	10.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
4/6/2018	JK Prepare document production for K. Kramer review	3.10 100.00/hr	310.00
	JK Review new documents received from Misty Porter	2.10 100.00/hr	210.00
	KBK Exchange emails with Julia Korkus regarding document production and discovery	0.10 175.00/hr	17.50
4/8/2018	JK Prepare documents and email to K. Kramer re: draft production review	3.70 100.00/hr	370.00
4/9/2018	JK Phone calls w/ K. Kramer re: request to produce and document production	0.90 100.00/hr	90.00
	JK Prepare privilege log	0.20 100.00/hr	20.00
	JK Review requests to admit and requests to produce	0.60 100.00/hr	60.00
	JK Prepare documents to produce	3.10 100.00/hr	310.00
	KBK Review and revise response to requests to admit and requests to produce; telephone conference with Julia Korkus regarding document production	1.10 175.00/hr	192.50
	KBK Review and approve final response to requests to admit; revise and finalize response to requests to produce	0.60 175.00/hr	105.00
	KBK Telephone conference with Julia Korkus regarding requests to produce	0.50 175.00/hr	87.50
4/10/2018	JK Revise interrogatories and phone conf. w/ K. Kramer	0.20 100.00/hr	20.00
	JK Review client documents from Misty Porter	2.50 100.00/hr	250.00
	KBK Review and begin revising interrogatory responses; telephone conference with Julia Korkus regarding interrogatories and other discovery issues	0.20 175.00/hr	35.00
4/11/2018	GJV t/c K. Kramer; email D. Schroeder and review reply	0.30 320.00/hr	96.00
	GJV E-mails with K. Kramer and D. Schroeder	0.20 320.00/hr	64.00
	JK Review D response to P motion to compel	0.20 100.00/hr	20.00

Misty Porter

			<u>Hrs/Rate</u>	<u>Amount</u>
4/11/2018	JK	Revise interrogatories	1.20 100.00/hr	120.00
	KBK	Receive and review D-H's response to Misty Porter's motion to compel documents related to Leslie DeMars	0.60 175.00/hr	105.00
	KBK	Telephone conference with Geoffrey Vitt regarding discovery status and next steps	0.20 175.00/hr	35.00
	KBK	Revise interrogatory responses; telephone conference with Julia Korkus; email to Geoffrey Vitt regarding interrogatories; exchange emails with Geoffrey Vitt regarding deposition of Misty Porter	1.50 175.00/hr	262.50
	KBK	Revise interrogatory responses	0.50 175.00/hr	87.50
	KBK	Email to Geoffrey Vitt regarding discovery schedule	0.10 175.00/hr	17.50
	KBK	Telephone conference with Julia Korkus about discovery schedule and interrogatories	0.30 175.00/hr	52.50
4/12/2018	GJV	Several emails with K. Kramer re: discovery issues and review Scheduling Order and service of process issues	0.30 320.00/hr	96.00
	JK	Research and prepare amended discovery documents	1.70 100.00/hr	170.00
	JK	Receive and review K. Kramer email and amended discovery schedule	0.20 100.00/hr	20.00
	KBK	Exchange emails with Geoffrey Vitt regarding subpoenas of D-H employees	0.20 175.00/hr	35.00
	KBK	Research gender discrimination lawsuit filed against Don Schroeder; emails to Geoffrey Vitt, Julia Korkus and Misty Porter regarding same	0.30 175.00/hr	NO CHARGE
	KBK	Review and revise amended discovery schedule and motion to amend discovery schedule from Julia Korkus; circulate to Geoffrey Vitt and Julia Korkus; receive and review email response from Geoffrey Vitt	0.60 175.00/hr	105.00
4/13/2018	JK	Email w/ Misty Porter re: bank mortgage documents	0.10 100.00/hr	10.00
	JK	Review correspondence and production from D-H	2.00 100.00/hr	200.00
	KBK	Send revised discovery schedule and proposed motion to amend discovery schedule to Don Schroeder and Dan Long; receive and review email from Dan Long regarding proof of service for subpoenas	0.20 175.00/hr	35.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/13/2018	KBK Telephone conference with Geoffrey Vitt; research EEOC and state law administrative exhaustion requirement for disability claims; prepare email to Geoffrey Vitt re: same; telephone conference with Geoffrey Vitt re: same	3.50 175.00/hr	NO CHARGE
	KBK Receive and review executed proofs of service of subpoenas	0.10 175.00/hr	NO CHARGE
4/16/2018	JK Review document production from D-H	3.20 100.00/hr	320.00
	KBK Revise MHMH interrogatory responses; email interrogatories to Misty Porter	1.70 175.00/hr	297.50
	KBK Revise DHMC interrogatory responses	2.30 175.00/hr	402.50
	KBK Telephone conference with Geoffrey Vitt regarding next steps	0.20 175.00/hr	35.00
4/17/2018	JK Research and prepare documents re: ASRM violations and guidelines	2.20 100.00/hr	220.00
	KBK Revise response to DHMC interrogatories; exchange emails with Misty Porter regarding MHMH interrogatories	0.60 175.00/hr	105.00
	KBK Exchange emails with Dan Long regarding joint motion to extend discovery schedule; revise responses to DHMC interrogatories; research ASRM guidelines	1.20 175.00/hr	210.00
	KBK Revise response to DHMC interrogatories	2.90 175.00/hr	507.50
	KBK Email to Misty Porter regarding new deposition dates; exchange emails with Misty and Geoffrey Vitt regarding depositions	0.30 175.00/hr	52.50
4/18/2018	JK Prepare documents for production	2.70 100.00/hr	270.00
	KBK Revise MHMH interrogatories with edits from Misty; circulate revised response to MHMH interrogatories to Misty Porter, Geoffrey Vitt and Julia Korkus	0.60 175.00/hr	105.00
	KBK Exchange emails with Misty Porter about interrogatories	0.20 175.00/hr	35.00
	KBK Receive and review court's order granting motion to amend discovery schedule	0.10 175.00/hr	17.50
4/19/2018	JK Review documents and prepare separate M. Porter medical and disability timeline re: D-H and Mayo	3.40 100.00/hr	340.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/19/2018	JK	Meeting w/ K. Kramer re: discovery	0.30 100.00/hr	30.00
	JK	Meeting w/ G. Vitt and K. Kramer re: discovery process and plan	0.90 100.00/hr	90.00
	GJV	Review answers to interrogatories and conf. K. Kramer and J. Korkus	1.90 320.00/hr	608.00
	KBK	Meeting with Julia Korkus regarding discovery	0.30 175.00/hr	52.50
	KBK	Exchange emails with Dan Long regarding document production from D-H	0.20 175.00/hr	35.00
	KBK	Prepare for meeting with Geoffrey Vitt and Julia Korkus; meeting with Geoffrey Vitt and Julia Korkus to discuss discovery process and strategy	2.30 175.00/hr	402.50
	KBK	Draft joint motion for status conference regarding confidentiality order	0.50 175.00/hr	87.50
4/20/2018	JK	Meeting w/ K. Kramer re: discovery and EEOC filing	1.20 100.00/hr	120.00
	JK	Phone call and emails w/ Amon Kinsey re: Form 5 and process	0.40 100.00/hr	40.00
	JK	Prepare charge form for EEOC	0.70 100.00/hr	70.00
	JK	Phone call and email to Sarah Burke Cohen/NHCHR re: statute of limitations and EEOC/NHCHR	0.40 100.00/hr	40.00
	KBK	Revise responses to DHMC interrogatory; exchange emails with Misty Porter regarding interrogatory preparation; meeting with Julia Korkus regarding discovery; email to Don Schroeder and Dan Long regarding deposition dates; meeting with Geoffrey Vitt regarding discovery; meeting with Julia Korkus regarding discovery	3.00 175.00/hr	525.00
	KBK	Revise motion for status conference; meeting with Geoffrey Vitt; meeting with Julia Korkus; revise response to DHMC interrogatories; meeting with Misty Porter, Geoffrey Vitt and Julia Korkus regarding discovery	2.50 175.00/hr	437.50
	KBK	Telephone conference with EEOC representative; portion of meeting with Geoffrey Vitt, Julia Korkus, and Misty spent discussing EEOC filing deadline; meetings with Geoffrey Vitt regarding EEOC filing deadline; meetings with Julia Korkus regarding EEOC filing deadline	1.60 175.00/hr	NO CHARGE
4/22/2018	GJV	Review memorandum on witnesses and review answers to interrogatories and multiple emails	0.80 320.00/hr	256.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/22/2018	KBK	Revise response to DHMC interrogatories; email to Misty Porter, Geoffrey Vitt and Julia Korkus with final draft of response to DHMC interrogatories	2.90 175.00/hr	507.50
	KBK	Receive email from Misty Porter with revisions to interrogatories; review revisions and email to Misty Porter re: same	0.20 175.00/hr	35.00
4/23/2018	GJV	Review draft reply brief	0.40 320.00/hr	128.00
	JK	Phone calls w/ K. Kramer re: interrogatories	0.20 100.00/hr	20.00
	JK	Revise and review interrogatories	1.30 100.00/hr	130.00
	JK	Review document production to D-H	2.80 100.00/hr	280.00
	JK	Receive and review file memo from G. Vitt	0.20 100.00/hr	20.00
	KBK	Revise response to DHMC interrogatories to incorporate comments from Misty Porter	0.40 175.00/hr	70.00
	KBK	Telephone conference with Julia Korkus regarding interrogatories and EEOC filing; exchange emails with Geoffrey Vitt regarding DHMC interrogatories	0.20 175.00/hr	35.00
	KBK	Telephone conference with Julia Korkus regarding interrogatories	0.10 175.00/hr	17.50
	KBK	Draft reply to motion to compel regarding Leslie DeMars; email draft reply brief to Geoffrey Vitt; receive and review Julia Korkus's email to Don Schroeder and Dan Long producing interrogatory responses from Misty Porter in response to interrogatories from DHMC and MHMH	2.40 175.00/hr	420.00
	KBK	Research EEOC filing deadline and effect on lawsuit	0.20 175.00/hr	NO CHARGE
4/24/2018	GJV	Research whistleblower claim	0.20 320.00/hr	64.00
	JK	Research on violation of law	1.30 100.00/hr	130.00
	KBK	Finalize reply brief to motion to compel documents regarding Leslie DeMars	0.90 175.00/hr	157.50
	KBK	Two telephone conferences with Alexandria Richard of the New Hampshire Human Rights Commission regarding administrative exhaustion deadline	0.30 175.00/hr	NO CHARGE



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/24/2018	KBK	Receive email from Judge Crawford's chambers proposing time for status conference hearing; exchange emails with Geoffrey Vitt regarding status conference	0.10 175.00/hr	17.50
4/25/2018	GJV	T/c E. Jones; emails with K. Kramer	0.60 320.00/hr	NO CHARGE
	JK	Review document production from D-H	2.50 100.00/hr	250.00
	KBK	Telephone conference with Judge Crawford's chambers regarding status conference date	0.10 175.00/hr	17.50
	KBK	Telephone conference with Misty Porter regarding status and next steps	0.70 175.00/hr	NO CHARGE
	KBK	Review plaintiff's draft production of documents and prepare feedback to Julia Korkus re: documents	2.40 175.00/hr	420.00
	KBK	Telephone conference with Geoffrey Vitt regarding additional claims	0.20 175.00/hr	35.00
4/26/2018	JK	Research on local rules and Judge Crawford's unwritten rules	0.30 100.00/hr	30.00
	JK	Phone conf. w/ K. Kramer re: claims and document production	0.70 100.00/hr	70.00
	JK	Emails w/ K. Kramer re: discovery, claims, production	0.20 100.00/hr	20.00
	JK	Review document production from D-H	3.10 100.00/hr	310.00
	JK	Receive and review email from K. Kramer	0.20 100.00/hr	20.00
	KBK	Exchange emails with Geoffrey Vitt; exchange emails with Julia Korkus regarding discovery	0.20 175.00/hr	35.00
	KBK	Telephone conference with Julia Korkus about additional potential claims and document production	0.70 175.00/hr	122.50
4/27/2018	JK	Email from K. Kramer and review draft opposition to D. Schroeder's pro hac vice	0.30 100.00/hr	30.00
	JK	Phone conf. w/ K. Kramer re: document production review	0.70 100.00/hr	70.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/27/2018	JK Review production from D-H	3.20 100.00/hr	320.00
	KBK Draft opposition to Donald Schroeder's anticipated <i>pro hac vice</i> application	1.30 175.00/hr	227.50
	KBK Telephone conference with Julia Korkus re: document production	0.70 175.00/hr	122.50
	KBK Email to Dan Long regarding documents and deposition dates; telephone conference with Judge Crawford's chambers regarding status conference	0.20 175.00/hr	35.00
	KBK Draft opposition to Schroeder's <i>pro hac vice</i> application and circulate to Geoffrey Vitt, Julia Korkus, and Misty Porter	2.00 175.00/hr	350.00
	KBK Telephone conference with Judge Crawford's chambers regarding hearing dates; email to Geoffrey Vitt regarding dates for hearing	0.20 175.00/hr	35.00
	KBK Exchange emails with Dan Long regarding document production	0.10 175.00/hr	17.50
4/28/2018	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV File memo on deposition	0.30 320.00/hr	96.00
	GJV Review several emails	0.60 320.00/hr	192.00
	GJV Review deposition subpoenas and notice to D-H re: subpoenas	0.20 320.00/hr	64.00
	GJV Revisions to subpoenas	0.40 320.00/hr	128.00
4/29/2018	GJV Review draft opposition to D. Schroeder motion for <i>pro hac</i> admission and email K. Kramer	0.50 320.00/hr	NO CHARGE
4/30/2018	PGL Review motion from Ms. Kramer; email to Ms. Kramer	0.50 200.00/hr	100.00
	JK Emails, response and charge letter from M. Porter re: EEOC notice and D-H answers to Interrogatories	0.40 100.00/hr	40.00
	JK Review K. Kramer correspondence and production to M. Porter from D-H	2.20 100.00/hr	220.00
	JK Prepare discovery re: M. Porter production to D-H	2.30 100.00/hr	230.00

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Misty Porter

		<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2018	KBK Exchange emails with Misty Porter regarding receipt of EEOC notice of right to sue; call EEOC regarding notice of right to sue, leave message for Linda Ingles (investigator) and telephone conference with Amon Kinsey	0.40 175.00/hr	70.00
	KBK Receive and review emails from Dan Long regarding document production and discovery; email to Geoffrey Vitt regarding subpoenas and other issues; review interrogatories responses from Dartmouth-Hitchcock; email to Dan Long regarding subpoenas	0.40 175.00/hr	70.00
	For professional services rendered	135.50	\$17,811.50
	Previous balance		\$24,664.00
4/17/2018	Payment - thank you. Check No. 5094		(\$16,000.00)
	Total payments and adjustments		(\$16,000.00)
	Balance due		<u>\$26,475.50</u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	6.70	320.00	\$2,144.00
Julia Korkus	73.60	100.00	\$7,360.00
Katherine B. Kramer	46.90	175.00	\$8,207.50
Phillipa G. Lilienthal	0.50	200.00	\$100.00





Vitt & Associates  
LAW OFFICES

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

June 12, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12720

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2018	KBK	Receive email from Judge Crawford's chambers with hearing dates for motions; exchange emails with Liz Bower regarding dates	0.20 175.00/hr	NO CHARGE
	GJV	Series of email with K. Kramer re. discovery and subpoena	0.20 320.00/hr	64.00
	JK	Review and prepare production to D-H for atty review: texts, emails, certifications	6.10 100.00/hr	610.00
5/2/2018	KBK	Telephone conference with Geoffrey Vitt regarding subpoenas, discovery, and other issues	0.20 175.00/hr	35.00
	KBK	Email to Dan Long regarding subpoenas; email to Misty Porter regarding DHMC's response to interrogatories	0.40 175.00/hr	70.00
	KBK	Telephone conference with Julia Korkus regarding discovery and document productions; email to Dan Long regarding document production completion date; receive and review email from Misty Porter regarding DHMC interrogatory responses	0.70 175.00/hr	122.50
	KBK	Review draft production of Misty Porter documents and provide notes regarding the production to Julia Korkus	1.80 175.00/hr	315.00
	KBK	Exchange emails with Misty Porter regarding subpoenas	0.30 175.00/hr	52.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/2/2018	JK Phone conf. w/ K. Kramer re: production, discovery review	0.40 100.00/hr	40.00
	JK Review and prepare production to D-H for atty review: texts, emails, certifications	6.30 100.00/hr	630.00
	JK Research and emails w/ L. Bower on medical release forms	0.20 100.00/hr	20.00
5/3/2018	KBK Exchange emails with Dan Long, Don Schroeder and Geoffrey Vitt regarding Defendants' document production; exchange emails with Dan Long, Don Schroeder and Geoffrey Vitt regarding subpoena responses	0.30 175.00/hr	52.50
5/6/2018	GJV Outline and review motion to compel and D-H refusal to provide information re: subpoenas; prepare agenda and email KBK	0.70 320.00/hr	224.00
5/7/2018	KBK Prepare for meeting with Misty and Tom Porter	0.30 175.00/hr	52.50
	KBK Meeting with Misty and Tom Porter and Geoffrey Vitt regarding legal strategy and litigation next steps	1.00 175.00/hr	175.00
	KBK Meeting with Misty and Tom Porter and Geoffrey Vitt regarding EEOC filing	0.50 175.00/hr	87.50
	KBK Meeting with Geoffrey Vitt to discuss strategy and next steps	0.40 175.00/hr	70.00
	KBK Email to Dan Long regarding subpoenas	0.10 175.00/hr	17.50
	KBK Research affidavit requirement for medical malpractice claims under Vermont law	0.20 175.00/hr	35.00
	KBK Travel to Norwich for meeting with Misty and Tom Porter	1.00 175.00/hr	175.00
	KBK Balance of travel to and from Norwich	2.00 175.00/hr	NO CHARGE
	GJV Conf. Tom and Misty Porter and K. Kramer; conf. K. Kramer and review motion issue	1.40 320.00/hr	448.00
	JK Receive email from K. Kramer on claims; research on claims background	0.50 100.00/hr	50.00
	JK Review new production from D-H.	0.90 100.00/hr	90.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2018	KBK Exchange emails with Misty Porter regarding possible medical malpractice claim	0.30 175.00/hr	52.50
	KBK Receive production of Leslie DeMars' text messages from Dan Long; review production; email to Geoffrey Vitt re: document production and possible motion	0.40 175.00/hr	70.00
	JK Receive and review Defense production: L. DeMars text messages	0.60 100.00/hr	60.00
5/9/2018	KBK Two telephone conference with Julia Korkus regarding discovery	0.90 175.00/hr	157.50
	KBK Email to Dan Long regarding production update	0.10 175.00/hr	17.50
	KBK Receive and review UVM employment contract from Misty Porter; exchange emails with Misty Porter regarding medical malpractice investigation	0.10 175.00/hr	17.50
	KBK Receive and review pro hac vice applications from Don Schroeder and Dan Long; email to Geoffrey Vitt and Misty Porter re: same	0.10 175.00/hr	17.50
	JK Conf. W/ KBK re: Porter production; notes	1.00 100.00/hr	100.00
	JK Review and prepare production to D-H for atty KBK review: chat messages w/ colleagues; email to KBK.	5.20 100.00/hr	520.00
5/10/2018	KBK Telephone conference with Julia Korkus regarding discovery	0.30 175.00/hr	52.50
	GJV Several emails	0.20 320.00/hr	64.00
	JK Review and prepare production to D-H for atty KBK review: chat messages w/ colleagues and friends	5.30 100.00/hr	530.00
	JK Conf. W/ KBK on Production to DH	0.30 100.00/hr	30.00
	JK Review new production from D-H.	0.70 100.00/hr	70.00
	JK Review and prepare production to D-H; tax returns, redactions	0.50 100.00/hr	50.00
5/11/2018	KBK Review Plaintiff's draft production of documents to prepare response to Defendants' request for documents; telephone conference with Julia Korkus regarding discovery	2.20 175.00/hr	385.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/11/2018	KBK	Telephone conference with Geoffrey Vitt	0.30 175.00/hr	NO CHARGE
	GJV	Review documents to produce	0.60 320.00/hr	192.00
	GJV	Review texts with DeMars	0.80 320.00/hr	256.00
	JK	Prepare first production set of docs; Conf. W/ KBK on Production to DH; email and update to G. Vitt	6.30 100.00/hr	630.00
	JK	Conf. w/ G. Vitt on Porter first production of documents to D-H.	0.20 100.00/hr	20.00
5/12/2018	GJV	Review texts	0.60 320.00/hr	192.00
5/14/2018	KBK	Exchange emails with Julia Korkus regarding document production	0.10 175.00/hr	17.50
	GJV	Review documents to produce	0.20 320.00/hr	64.00
	JK	Prepare production and privilege/redaction log of Porter first set of documents to D-H. Review additional set of chat messages w/ colleagues for atty review.	6.00 100.00/hr	600.00
	JK	Conf. w/ G. Vitt on medical malpractice plan and documents	0.10 100.00/hr	10.00
5/17/2018	GJV	E-mail	0.10 320.00/hr	32.00
	GJV	Review documents to produce	0.40 320.00/hr	128.00
	JK	Research and exchange emails with K. Kramer and M. Porter on contract documents with D-H.	0.50 100.00/hr	50.00
	JK	Conf. and email to G. Vitt re: disability timeline and medical malpractice inquiry.	0.20 100.00/hr	20.00
5/18/2018	KBK	Receive and review email from Julia Korkus forwarding correspondence from Misty Porter regarding contract with DHMC; prepare for phone call with Geoffrey Vitt	0.20 175.00/hr	35.00
	KBK	Telephone conference with Geoffrey Vitt regarding next steps	0.40 175.00/hr	70.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/18/2018	KBK Email to Dan Long regarding document production	0.10 175.00/hr	17.50
	KBK Email to Dan Long regarding subpoena responses	0.10 175.00/hr	17.50
	KBK Email to medical malpractice attorney	0.10 175.00/hr	17.50
	GJV T/c K. Kramer re: discovery to D-H; argument, amended complaint and depositions	0.20 320.00/hr	64.00
	GJV File memo on D-H requests	0.20 320.00/hr	64.00
	JK Receive and review G. Vitt email and memo on list of requests.	0.20 100.00/hr	20.00
	JK Review email from M. Porter on contract documents	0.20 100.00/hr	20.00
5/19/2018	GJV Review documents to produce and prepare memorandum	1.20 320.00/hr	384.00
5/21/2018	KBK Receive and review emails and memorandum from Geoffrey Vitt regarding next steps	0.10 175.00/hr	17.50
	KBK Receive and review update email from Misty Porter	0.10 175.00/hr	17.50
	GJV Review documents to produce	0.20 320.00/hr	64.00
5/22/2018	KBK Email to Dan Long following up regarding document production and receive bounce-back message	0.10 175.00/hr	17.50
	KBK Call to Chris Maley and leave message with receptionist regarding medical malpractice claim evaluation; telephone conference with Don Schroeder regarding attorney staffing and Dan Long; email to Geoffrey Vitt re same	0.50 175.00/hr	87.50
5/23/2018	KBK Meeting with Geoffrey Vitt to discuss strategy and next steps	0.40 175.00/hr	70.00
	GJV Meeting with K. Kramer to discuss strategy and next steps	0.40 320.00/hr	128.00
5/24/2018	KBK Receive and review email from Misty Porter regarding federal funding; exchange emails with Geoffrey Vitt	0.20 175.00/hr	35.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/24/2018	GJV T/c G. Eaton	0.20 320.00/hr	64.00
5/25/2018	JK Conf. w/ G. Vitt on medical malpractice review; communication with S. Adler office and email documents to S. Adler.	0.50 100.00/hr	50.00
5/29/2018	KBK Receive and review email from Geoffrey Vitt to Misty Porter regarding medical malpractice claim	0.10 175.00/hr	NO CHARGE
	KBK Exchange emails with Jo LaMarche from Judge Crawford's chambers and Don Schroeder regarding rescheduling hearing date	0.10 175.00/hr	17.50
	GJV E-mails with M. Porter and S. Adler	0.20 320.00/hr	64.00
5/30/2018	JK Email to S. Adler	0.10 100.00/hr	10.00
5/31/2018	KBK Telephone conference with Geoffrey Vitt regarding medical malpractice claim	0.20 175.00/hr	35.00
	For professional services rendered	67.00	\$9,228.50
	Previous balance		\$26,475.50
	5/31/2018 Payment - thank you. Check No. 5105		(\$13,000.00)
	Total payments and adjustments		(\$13,000.00)
	Balance due		<u>\$22,704.00</u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	7.80	320.00	\$2,496.00
Julia Korkus	42.30	100.00	\$4,230.00
Katherine B. Kramer	14.30	175.00	\$2,502.50





## Vitt &amp; Associates

LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

July 12, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12784

## Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2018	GJV	File memorandum re: document review	0.20 320.00/hr	64.00
6/6/2018	KBK	Exchange emails with Don Schroeder regarding Dartmouth-Hitchcock's document production	0.10 175.00/hr	17.50
	KBK	Exchange emails with Misty Porter regarding case update	0.10 175.00/hr	17.50
6/7/2018	KBK	Research Section 504 claim and VFEPA claim for amending complaint and prepare memorandum regarding same	2.10 175.00/hr	NO CHARGE
	KBK	Telephone conference with G. Vitt	0.10 175.00/hr	17.50
6/8/2018	JK	Receive and review K. Kramer memo on potential claims for amended complaint.	0.40 100.00/hr	40.00
	KBK	Revise memorandum regarding additional claims and circulate to Geoffrey Vitt and Julia Korkus	0.60 175.00/hr	105.00
	KBK	Prepare for telephone conference with Misty Porter; telephone conference with Misty Porter; email to Geoffrey Vitt	1.30 175.00/hr	227.50
	KBK	Email memorandum regarding additional claims to Misty Porter	0.10 175.00/hr	17.50

Vitt &amp; Associates, PLC

8 Beaver Meadow Road, PO Box 1229, Norwich, VT 05055 802-649-5700 ~ Fax 802-649-1692  
PO Box 349, Hanover, NH 03755 603-640-6173 [www.vittandassociates.com](http://www.vittandassociates.com)

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2018	KBK Email to Misty Porter regarding June 28 hearings	0.10 175.00/hr	17.50
6/11/2018	JK Conf. w/ G. Vitt on production.	0.10 100.00/hr	10.00
	KBK Exchange emails with Misty Porter regarding New Hampshire licensing board	0.10 175.00/hr	17.50
	KBK Receive and review email from Misty Porter to Steve Adler, Esq.; receive and review email from Don Schroeder	0.20 175.00/hr	35.00
	KBK Meeting with Geoffrey Vitt regarding discovery	0.10 175.00/hr	17.50
	KBK Meeting with Julia Korkus regarding strategy and next steps	0.30 175.00/hr	52.50
6/13/2018	GJV Review email	0.10 320.00/hr	32.00
	JK Correspondence to D. Schroeder w/ Plaintiff's first production	1.10 100.00/hr	110.00
	KBK Briefly review latest document production from Dartmouth-Hitchcock; email to Geoffrey Vitt and Julia Korkus regarding production; email to Geoffrey Vitt regarding strategy for oral argument	1.00 175.00/hr	175.00
	KBK Receive and review email from Jo LaMarche in Judge Crawford's chambers regarding hearing date; exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK Receive and review email from Julia Korkus regarding production of Misty Porter's documents	0.10 175.00/hr	17.50
6/19/2018	GJV Review K. Kramer memorandum and review retaliation issue	0.60 320.00/hr	192.00
6/21/2018	KBK Receive and review rescheduled court hearing notice; email to Misty Porter regarding new hearing date	0.10 175.00/hr	17.50
6/25/2018	GJV E-mails re: document production	0.10 320.00/hr	32.00
	KBK Email to Geoffrey Vitt regarding requests to admit	0.10 175.00/hr	17.50
	KBK Email to Don Schroeder and Jessica Joseph regarding document production; research regarding whistleblower statute; email to Misty Porter regarding gathering facts	0.70 175.00/hr	122.50



Misty Porter

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	<u>Hrs/Rate</u>	<u>Amount</u>
6/27/2018 KBK Receive and review email from Jessica Joseph regarding document production	0.10 175.00/hr	17.50
For professional services rendered	10.00	\$1,407.50
Previous balance		\$22,704.00
6/26/2018 Payment - thank you. Check No. 5172		(\$8,028.00)
Total payments and adjustments		(\$8,028.00)
Balance due		<u><u><del>-\$16,083.50</del></u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	1.00	320.00	\$320.00
Julia Korkus	1.60	100.00	\$160.00
Katherine B. Kramer	5.30	175.00	\$927.50



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

August 08, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12837

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
7/2/2018	KBK Email Misty Porter regarding medical malpractice claim	0.10 175.00/hr	17.50
7/3/2018	KBK Exchange emails with Misty Porter regarding medical malpractice; email to Steve Adler regarding medical malpractice	0.10 175.00/hr	17.50
7/10/2018	KBK Telephone conference with Steve Adler	0.60 175.00/hr	105.00
	KBK Exchange emails with Geoffrey Vitt regarding hearing	0.10 175.00/hr	17.50
	GJV Review pleadings re: discovery dispute and prepare for hearing before Judge Crawford and start outline for argument	1.80 320.00/hr	576.00
	JK Reviewing fourth production from D-H and printing	2.30 100.00/hr	230.00
7/11/2018	KBK Assess discovery status; email to Jessica Joseph regarding document production	0.10 175.00/hr	17.50
	KBK Exchange emails with Jessica Joseph regarding document production; email to Julia Korkus regarding same	0.10 175.00/hr	17.50
	KBK Prepare for call with Geoffrey Vitt; telephone conference with Geoffrey Vitt	0.70 175.00/hr	122.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/11/2018	KBK Review letter from Steve Adler; telephone conference with Geoffrey Vitt; exchange emails with Misty Porter	0.50 175.00/hr	87.50
	KBK Exchange emails with Geoffrey Vitt regarding discovery schedule	0.10 175.00/hr	17.50
	GJV Review motion to compel	0.30 320.00/hr	96.00
	GJV T/c K. Kramer and review issues for hearing	0.90 320.00/hr	288.00
	JK Reviewing fourth production from D-H and printing	3.80 100.00/hr	380.00
7/12/2018	KBK Receive and review email from Geoffrey Vitt to Don Schroeder attaching proposed amended discovery order; receive and review email from Jessica Joseph regarding privilege log	0.10 175.00/hr	17.50
	GJV Review email and revise proposed discovery schedule	0.20 320.00/hr	64.00
	GJV Revise Discovery Schedule and email D. Schroeder	0.30 320.00/hr	96.00
	GJV Email with J. Joseph re: Privilege Log	0.10 320.00/hr	32.00
	JK Reviewing fourth production from D-H and printing	2.50 100.00/hr	250.00
7/13/2018	JK Reviewing fourth production from D-H, printing, coding.	4.50 100.00/hr	450.00
7/15/2018	KBK Prepare for oral argument on motion for ex parte interviews and status conference	2.10 175.00/hr	367.50
7/16/2018	KBK E-mail to Julia Korkus	0.10 175.00/hr	17.50
	KBK E-mail to Misty Porter	0.10 175.00/hr	17.50
	KBK Multiple telephone conferences with Geoffrey Vitt	0.50 175.00/hr	87.50
	KBK Review emails between Geoffrey Vitt and Don Schroeder regarding discovery schedule	0.20 175.00/hr	35.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/16/2018	KBK	Prepare for oral argument on motion for ex parte interviews, status conference, and motion to compel	5.60 175.00/hr	980.00
	SE	Reading and tagging emails	0.60 50.00/hr	30.00
	GJV	Several emails and t/c K. Kramer	0.30 320.00/hr	96.00
	GJV	Outline for argument	0.40 320.00/hr	128.00
	GJV	Prepare for hearing	1.30 320.00/hr	416.00
	JK	Email from K.B. Kramer and updates to production log	0.80 100.00/hr	80.00
7/17/2018	KBK	Prepare for hearing on motion for ex parte interviews, motion to compel, and status conference	3.60 175.00/hr	630.00
	KBK	Round trip travel to Rutland for hearing	1.80 175.00/hr	315.00
	KBK	Meeting with Geoffrey Vitt; meeting with Geoffrey Vitt and Misty Porter; hearing before Judge Crawford on motion for ex parte interviews, motion to compel, and status conference	2.80 175.00/hr	490.00
	SE	Reviewing and organizing emails	4.60 50.00/hr	230.00
	GJV	Prepare for and argument before Judge Crawford in Rutland; conference M. Porter	5.80 320.00/hr	1,856.00
	JK	Reviewing fifth production from defendants' and printing key docs	4.80 100.00/hr	480.00
7/18/2018	SE	Reviewing and organizing emails	2.60 50.00/hr	130.00
	GJV	Review email	0.20 320.00/hr	64.00
	JK	Reviewing fifth production from defendants' and printing key docs	4.50 100.00/hr	450.00
7/19/2018	KBK	Revise amended complaint	1.00 175.00/hr	175.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2018	KBK Draft motion for leave to amend	0.20 175.00/hr	35.00
	KBK Telephone conference with G. Vitt	0.10 175.00/hr	17.50
	SE Reviewing emails and organizing	4.80 50.00/hr	240.00
	SE Conference with J. Korkus	0.30 50.00/hr	15.00
	GJV Second requests to Dartmouth	0.90 320.00/hr	288.00
	JK Reviewing fifth production from defendants' and printing key docs	6.30 100.00/hr	630.00
7/20/2018	KBK Review email from production of documents from Dartmouth-Hitchcock; revise proposed amended complaint; telephone conference with Geoffrey Vitt	1.40 175.00/hr	245.00
	KBK Draft motion for leave to amend	0.80 175.00/hr	140.00
	KBK Finalize proposed amended complaint; send proposed amended complaint and redline comparison of initial complaint and amended complaint to Don Schroeder and Jessica Joseph	0.40 175.00/hr	70.00
	SE Review emails and enter on spreadsheet per J. Korkus	5.30 50.00/hr	265.00
	GJV Review draft complaint; t/c Kramer and email	0.60 320.00/hr	192.00
	JK Reviewing fifth production from defendants', printing key docs, coding	5.20 100.00/hr	520.00
7/23/2018	SE Updating Email Spreadsheet	3.40 50.00/hr	170.00
7/24/2018	KBK Review proposed joint motion to amend discovery schedule and proposed amended discovery schedule; telephone conference with Misty Porter; exchange emails with Geoffrey Vitt	0.20 175.00/hr	35.00
	SE Updating Email Spreadsheet	1.80 50.00/hr	90.00
	GJV E-mail re: DeMars emails	0.20 320.00/hr	64.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/24/2018	GJV E-mail	0.10 320.00/hr	32.00
7/25/2018	KBK Prepare for telephone conference with Geoffrey Vitt and Misty Porter	0.20 175.00/hr	35.00
	KBK Telephone conference with G. Vitt and Misty Porter	0.20 175.00/hr	35.00
	KBK Telephone conference with G. Vitt and Misty Porter	0.60 175.00/hr	105.00
	KBK Call to Don Schroeder; email to Don Schroeder regarding amended complaint	0.20 175.00/hr	35.00
	SE Updating Email Spreadsheet	1.10 50.00/hr	55.00
	GJV Telephone conference with M. Porter and K. Kramer	0.60 320.00/hr	192.00
	GJV File memorandum and email K. Kramer	1.00 320.00/hr	320.00
	GJV E-mail J. Korkus re: document production by D-H	0.20 320.00/hr	64.00
	JK Exchange emails w/ G. Vitt re: D-H production content; Rule 30(b)(6) Notice; second set of requests to D-H	0.50 100.00/hr	50.00
	JK Updates to log of production rcvd from defendants	0.30 100.00/hr	30.00
7/26/2018	KBK Call Don Schroeder and leave a message; email to Don Schroeder and Jessica Joseph; draft motion for leave to amend complaint; email draft of motion for leave to amend complaint to Geoffrey Vitt; email motion exhibits to Liz Bower	2.30 175.00/hr	402.50
	SE Updating Email Spreadsheet	2.40 50.00/hr	120.00
	GJV Review draft motion to amend	0.20 320.00/hr	64.00
7/27/2018	KBK Revise motion to amend complaint; finalize for filing	0.40 175.00/hr	70.00
	SE Updating Email Spreadsheet	5.30 50.00/hr	265.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/29/2018	GJV	E-mails about document review and D-H varied reasons for closing REI Division	0.60 320.00/hr	192.00
	SN	Conf. With GJV RE discovery issues	0.20 80.00/hr	16.00
7/30/2018	KBK	Travel to Norwich for meeting with Misty Porter	1.50 175.00/hr	262.50
	KBK	Balance of travel time	1.50 175.00/hr	NO CHARGE
	KBK	Prepare for meeting with Misty Porter	0.30 175.00/hr	52.50
	KBK	Meeting with Misty Porter and Geoffrey Vitt	1.30 175.00/hr	227.50
	KBK	Meeting with G. Vitt	0.10 175.00/hr	17.50
	KBK	Meeting with Julia Korkus, Sarah Nunan and Geoffrey Vitt regarding review of defendants' document production	0.80 175.00/hr	140.00
	KBK	Review emails and other documents from Misty Porter	0.40 175.00/hr	70.00
	KBK	Exchange emails with Misty Porter regarding summary judgment	0.40 175.00/hr	70.00
	KBK	Review memo for G. Vitt	0.10 175.00/hr	17.50
	SE	Combined all spreadsheet tabs into one and added links to pdf	0.70 50.00/hr	35.00
	SE	Prepare and mail amended complaint	0.80 50.00/hr	40.00
	GJV	Review two memos and conference M. and T. Porter and K. Kramer re: status and discovery issues	1.50 320.00/hr	480.00
	GJV	Conference S. Nunan, J. Korkus and K. Kramer re: D-H document production, holes in production, search protocol, Privilege Log	0.70 320.00/hr	224.00
	GJV	Conference K. Kramer re: mediation and document production	0.20 320.00/hr	64.00
	GJV	T/c SN re: document searches	0.20 320.00/hr	64.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/30/2018	SN Meeting with G. Vitt, K. Kramer & J. Korkus to review status of production and how to analyze and respond to Schroder	0.80 80.00/hr	64.00
	SN Reviewed production log, conf. With S. Edson regarding changing to searchable doc with links for discovery purposes	0.20 80.00/hr	16.00
	SN Reviewed amended complaint	0.70 80.00/hr	56.00
	JK Review motion for leave to amend	0.30 100.00/hr	30.00
	JK Conference w/ G. Vitt, K.B. Kramer, S. Nunan re: D-H production of documents	0.80 100.00/hr	80.00
	JK Review Stipulated Discovery Schedule/Order re: production requirements and email to S. Nunan.	0.20 100.00/hr	20.00
7/31/2018	KBK Receive and review correspondence from Geoffrey Vitt to Don Schroeder	0.10 175.00/hr	17.50
	KBK Revise file memo regarding meeting with Misty Porter	0.30 175.00/hr	52.50
	SE Finished adding links to spreadsheet	4.30 50.00/hr	215.00
	GJV Prepare file memorandum on 7/30 meeting and begin preparation of second requests	1.50 320.00/hr	480.00
	GJV Revise memorandum and work on second requests	1.80 320.00/hr	576.00
	JK Receive emails from G. Vitt; review D-H production per risk management	0.80 100.00/hr	80.00
	For professional services rendered	133.50	\$18,525.00
	Additional Charges :		
7/25/2018	Conference Call		8.00
	Total costs		<u>\$8.00</u>
	Total amount of this bill		<u>\$18,533.00</u>
	Previous balance		\$16,083.50
7/31/2018	Payment - thank you. Check No. 5198		<u>(\$1,407.50)</u>

Misty Porter

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Amount

Total payments and adjustments

(\$1,407.50)

Balance due

\$33,209.00

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	21.90	320.00	\$7,008.00
Julia Korkus	37.60	100.00	\$3,760.00
Katherine B. Kramer	32.60	175.00	\$5,705.00
Shannon Edson	38.00	50.00	\$1,900.00
Sarah Nunan	1.90	80.00	\$152.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

September 13, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12908

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2018	GJV	Revise second set of requests	0.30 320.00/hr	96.00
	SE	Adding links to emails	2.40 50.00/hr	120.00
	SE	Conf. with J. Korkus	0.10 50.00/hr	5.00
	JK	Email to G. Vitt re: Risk Management and D-H production	0.50 100.00/hr	50.00
	JK	Review and update date formatting on searchable discovery log	1.60 100.00/hr	160.00
	KBK	Exchange emails with Jessica Joseph and Don Schroeder	0.10 175.00/hr	17.50
8/2/2018	GJV	Several e-mails	0.30 320.00/hr	96.00
	SN	Reviewed documents per GJV	3.30 80.00/hr	264.00
	SE	Link Emails on Spreadsheet	1.80 50.00/hr	90.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/2/2018	JK	Reviewing key documents from first through fifth discovery production from D-H.	4.20 100.00/hr	420.00
	KBK	E-mail from Misty Porter	0.10 175.00/hr	17.50
	KBK	Receive seventh production of documents from Jessica Joseph; email to Jessica Joseph; exchange emails with Julia Korkus	0.20 175.00/hr	35.00
8/3/2018	GJV	E-mails	0.20 320.00/hr	64.00
	JK	Review additional DeMars document from D-H discovery	0.10 100.00/hr	10.00
	JK	Review of defendants' seventh document production	4.70 100.00/hr	470.00
	JK	Email to defendants' counsel re: production documents	0.20 100.00/hr	20.00
	KBK	Exchange emails with Julia Korkus regarding document production; review documents produced by Leslie DeMars; exchange emails with Misty Porter	0.40 175.00/hr	70.00
8/5/2018	GJV	Second requests and email re: subpoena	0.20 320.00/hr	64.00
8/6/2018	JK	Review of defendants' seventh document production	4.30 100.00/hr	430.00
	KBK	Telephone conference with Julia Korkus	0.30 175.00/hr	52.50
8/7/2018	SE	Update email spreadsheet	1.70 50.00/hr	85.00
	JK	Emails w/ K. Kramer re: defendants' production content.	0.20 100.00/hr	20.00
	JK	Review of defendants' seventh document production	1.20 100.00/hr	120.00
8/8/2018	JK	Review of defendants' sixth document production	3.70 100.00/hr	370.00
	JK	Review of defendants' native file document production	1.20 100.00/hr	120.00
	KBK	Email to Geoffrey Vitt; receive and review email from Steve Adler; email to Steve Adler; email to Don Schroeder	0.20 175.00/hr	35.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/9/2018	GJV	Work on revised discovery	0.30 320.00/hr	96.00
	GJV	Review decision	0.20 320.00/hr	64.00
	SN	Reviewing lists in discovery; conf. with S. Edson; Conf with JK	1.10 80.00/hr	88.00
	JK	Review decision on motion for auth to contact employees ex parte and motion to compel	0.30 100.00/hr	30.00
	JK	Review of native document production from defendants	1.70 100.00/hr	170.00
	JK	Review of defendants' sixth document production	0.70 100.00/hr	70.00
	KBK	Receive and review court order granting motion for ex parte interviews and granting motion to compel; email to Misty Porter; email to Don Schroeder about represented individuals; leave voicemail from Jessica Joseph regarding privilege log	0.30 175.00/hr	52.50
8/10/2018	GJV	E-mails	0.20 320.00/hr	64.00
	GJV	E-mails	0.10 320.00/hr	32.00
	GJV	Revise Second set of requests	1.40 320.00/hr	448.00
	SE	Update email spreadsheet	2.00 50.00/hr	100.00
	SE	Conf. with J. Korkus Re. documents	0.30 50.00/hr	15.00
	JK	Review of defendants' sixth document production	2.80 100.00/hr	280.00
	KBK	Exchange emails with Geoffrey Vitt regarding privilege log	0.20 175.00/hr	35.00
8/11/2018	GJV	Prepare second requests to D-H	2.00 320.00/hr	640.00
8/12/2018	GJV	Prepare second requests and review production; email K. Kramer and J. Korkus	1.60 320.00/hr	512.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/12/2018	JK	Receive and review email from G. Vitt re: second requests to D-H	0.20 100.00/hr	20.00
8/13/2018	SE	Update email spreadsheet	4.50 50.00/hr	225.00
	KBK	Exchange emails with Jessica Joseph	0.10 175.00/hr	17.50
8/14/2018	SE	Update email spreadsheet	0.70 50.00/hr	35.00
	JK	Review defendants' native file production and update searchable log	0.50 100.00/hr	50.00
8/15/2018	SE	Update email spreadsheet	2.80 50.00/hr	140.00
	JK	Review defendants' native file production and update searchable log	0.70 100.00/hr	70.00
8/17/2018	JK	Review of defendants' sixth production	1.70 100.00/hr	170.00
8/20/2018	KBK	Email to Jessica Joseph; receive and review email from Jessica Joseph	0.10 175.00/hr	17.50
8/21/2018	JK	Review defendants' sixth, seventh and native file production and update searchable log	3.10 100.00/hr	310.00
8/22/2018	JK	Review searchable log of native emails for specific custodians.	3.30 100.00/hr	330.00
8/23/2018	JK	Review searchable log of native emails for specific custodians - review request to defendants.	3.10 100.00/hr	310.00
8/24/2018	JK	Review searchable log of native emails for specific custodians, dates, and events	3.20 100.00/hr	320.00
8/28/2018	JK	Conference phone call w/ K. Kramer and G. Vitt re: status of defendants' production and additional requests from plaintiff	0.50 100.00/hr	50.00
	JK	Review and prepare keydocs set from sixth and seventh production for K. Kramer and G. Vitt review.	4.30 100.00/hr	430.00
	GJV	Conf. J. Korkus and K. Kramer re: additional discovery and witness interviews	0.70 320.00/hr	224.00
	KBK	Exchange emails with Geoffrey Vitt and Julia Korkus regarding next steps	0.10 175.00/hr	17.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018	KBK Telephone conference with Geoffrey Vitt and Julia Korkus	0.70 175.00/hr	122.50
	KBK E-mail to Robert Bancroft	0.10 175.00/hr	17.50
8/29/2018	JK Review and prepare keydocs set from sixth and seventh production for K. Kramer and G. Vitt review.	4.60 100.00/hr	460.00
	KBK Exchange emails with Bob Bancroft	0.10 175.00/hr	17.50
8/30/2018	JK Review Herrick, Gunnell, DeMars, Padin emails re: closure discussions and staffing decisions	3.40 100.00/hr	340.00
	KBK Review documents from Julia Korkus	1.20 175.00/hr	210.00
	KBK Revise chart of people to interview ex parte; email to Julia Korkus regarding same	0.20 175.00/hr	35.00
8/31/2018	JK Review defendants' sixth and seventh production and searchable log for medical records, complaints from and by patients	1.20 100.00/hr	120.00
	JK Phone call w/ K. Kramer re: informal interviews and production	0.70 100.00/hr	70.00
	JK Emails w/ K. Kramer re: informal interviews contacts list and planning.	0.20 100.00/hr	20.00
	KBK Review DHMC response to plaintiff's first set of interrogatories; identify gaps in DHMC document production; prepare draft of second set of interrogatories	0.90 175.00/hr	157.50
	KBK Telephone conference with Julia Korkus regarding discovery and other issues	0.80 175.00/hr	140.00
	KBK Draft second set of interrogatories	1.00 175.00/hr	175.00
	KBK Draft list of individuals to interview ex parte; exchange update emails with Misty Porter; emails to Julia Korkus regarding interviews	1.40 175.00/hr	245.00
	For professional services rendered	94.80	\$10,864.50
	Previous balance		\$33,209.00
	8/21/2018 Payment - thank you. Check No. 5205		(\$18,533.00)
	Total payments and adjustments		(\$18,533.00)



Misty Porter

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Amount

Balance due

\$25,540.50

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	7.50	320.00	\$2,400.00
Julia Korkus	58.10	100.00	\$5,810.00
Katherine B. Kramer	8.50	175.00	\$1,487.50
Shannon Edson	16.30	50.00	\$815.00
Sarah Nunan	4.40	80.00	\$352.00



## Vitt &amp; Associates

ATTORNEYS AT LAW

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

October 15, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-12934

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
9/2/2018	GJV Review interrogatories	0.40 320.00/hr	128.00
9/3/2018	KBK Exchange emails with Geoffrey Vitt and Julia Korkus regarding discovery	0.10 175.00/hr	17.50
	JK Receive and review emails from G. Vitt and K. Burghardt Kramer re: discovery responses.	0.10 100.00/hr	10.00
	JK Prepare set of documents for review	0.70 100.00/hr	70.00
	GJV Prepare second requests and interrogatories to D-H	1.30 320.00/hr	416.00
9/4/2018	KBK Review draft of second set of requests to produce; revise requests to produce; exchange emails with Geoffrey Vitt; review revisions to second set of requests to produce	0.80 175.00/hr	140.00
	KBK Review interrogatories from Defendant Dartmouth-Hitchcock Clinic and Defendants' Second Set of Requests to Produce; email to Misty Porter regarding additional discovery requests	0.40 175.00/hr	70.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery	0.10 175.00/hr	17.50

Vitt &amp; Associates, PLC

8 Beaver Meadow Road, PO Box 1229, Norwich, VT 05055 802-649-5700 ~ Fax 802-649-1692  
PO Box 349, Hanover, NH 03755 603-640-6173 [www.vittandassociates.com](http://www.vittandassociates.com)

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/4/2018	KBK Review final version of second interrogatories	0.50 175.00/hr	87.50
	KBK Exchange emails with Misty Porter regarding discovery	0.10 175.00/hr	17.50
	JK Review and edit Second Interrogatories	0.20 100.00/hr	20.00
	JK Receive and review emails from G. Vitt and K. Burghardt Kramer re: new discovery requests from Defendants.	0.30 100.00/hr	30.00
	JK Receive and review additional discovery requests from Defense to Plaintiff: First Interrogatories from D-H Clinic & Second Request for Production	0.70 100.00/hr	70.00
	JK Search and review native file production from Defendants	1.70 100.00/hr	170.00
	GJV E-mail K. Kramer	0.10 320.00/hr	32.00
	GJV Review second requests and other discovery	0.90 320.00/hr	288.00
	GJV Review final requests and interrogatories	0.80 320.00/hr	256.00
9/5/2018	KBK Email Julia Korkus regarding expert	0.10 175.00/hr	17.50
9/7/2018	KBK Receive and review Defendants' answer to Plaintiff's amended complaint	0.10 175.00/hr	17.50
	KBK Email to Misty Porter; telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
	JK Receive and review Answer to Amended Complaint from DHMC et al	0.20 100.00/hr	20.00
9/10/2018	JK Receive and review eighth production from Defendants responsive to Request #44 of Plaintiff's First Request for Production	2.50 100.00/hr	250.00
9/11/2018	KBK Exchange emails with Julia Korkus regarding expert witness and discovery	0.20 175.00/hr	35.00
	JK Email exchange w/ K. Burghardt Kramer re: material for expert, discovery and production from Defendants	0.20 100.00/hr	20.00
	JK Review and gather documents for expert; email to R. Bancroft	1.20 100.00/hr	120.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/11/2018	JK	Review eighth production	1.30 100.00/hr	130.00
	JK	Search and review native emails re: key custodians	2.70 100.00/hr	270.00
9/12/2018	KBK	Email to Misty Porter about meeting	0.10 175.00/hr	17.50
	JK	Exchange emails w/ R. Bancroft and research.	0.20 100.00/hr	20.00
	JK	Search and prepare key docs set.	1.40 100.00/hr	140.00
9/13/2018	JK	Exchange emails w/ M. Porter and B. Bancroft re: economic damages information; review documents	0.30 100.00/hr	30.00
	JK	Email to K. Burghardt Kramer w/ set of key documents	0.30 100.00/hr	30.00
	JK	Search and review native files by key custodians and dates	3.60 100.00/hr	360.00
9/14/2018	KBK	Travel time to Norwich for meeting with Misty Porter	1.50 175.00/hr	262.50
	KBK	Balance of travel time to Norwich for meeting with Misty Porter	1.50 175.00/hr	NO CHARGE
	KBK	Meeting with Misty Porter and Geoffrey Vitt	1.40 175.00/hr	245.00
	JK	Exchange emails w/ R. Bancroft and M. Porter	0.30 100.00/hr	30.00
	GJV	Review documents produced in discovery	1.40 320.00/hr	448.00
9/15/2018	GJV	File memorandum of 9/14 meeting and begin outline for depositions and prepare email to K. Kramer and J. Korkus re: MP meeting and outline for depositions	2.10 320.00/hr	672.00
9/16/2018	GJV	Subpoena preparation	0.40 320.00/hr	128.00
	GJV	Subpoena and email K. Kramer	0.20 320.00/hr	64.00
9/17/2018	KBK	Review selected documents from production of documents regarding Leslie DeMars; email to Misty Porter regarding documents	0.50 175.00/hr	87.50

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/17/2018	KBK	Exchange emails with Misty Porter and Geoffrey Vitt; exchange emails with Misty Porter; exchange emails with Julia Korkus	0.20 175.00/hr	35.00
	JK	Review and update timeline, new client documents and email memos from G. Vitt	3.40 100.00/hr	340.00
	JK	Exchange emails M. Porter, income questions W-2, pay.	0.20 100.00/hr	20.00
	JK	Review and prepare information and exchange emails w/ R. Bancroft	1.40 100.00/hr	140.00
	JK	Exchange emails w/ K. Burghardt Kramer re: privilege log and damages	0.10 100.00/hr	10.00
	GJV	E-mail	0.10 320.00/hr	32.00
9/18/2018	JK	Review AAMC table re: damages	0.20 100.00/hr	20.00
	JK	Review document requests and documents for relevance	3.50 100.00/hr	350.00
	JK	Review text message from colleagues	1.20 100.00/hr	120.00
9/19/2018	KBK	Receive and review emails from Jessica Joseph regarding privilege log; exchange emails with Jessica Joseph regarding mediation	0.10 175.00/hr	17.50
	JK	Emails to Bancroft w/ documents	0.20 100.00/hr	20.00
	JK	Search and review native emails	1.20 100.00/hr	120.00
	GJV	E-mail re: Privilege Log	0.10 320.00/hr	32.00
9/20/2018	KBK	Draft responses to interrogatories from Dartmouth-Hitchcock Clinic and second set of requests to produce	0.90 175.00/hr	157.50
	KBK	Email to Misty Porter regarding discovery requests	0.30 175.00/hr	52.50
	KBK	Telephone conference with Geoffrey Vitt regarding discovery and other issues; receive and review Geoffrey Vitt's email to Donald Schroeder regarding privilege log	0.10 175.00/hr	17.50

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/20/2018	KBK	Exchange emails with Misty Porter regarding discovery; revise responses to discovery requests	0.20 175.00/hr	35.00
	JK	Telephone conference w/ R. Bancroft and email exchanges w/ same re: economic damages questions; summary email memo.	1.20 100.00/hr	120.00
	JK	Email to M. Porter re: questions on economic damages	0.20 100.00/hr	20.00
	JK	Receive and review email from K. Burghardt Kramer re: discovery	0.20 100.00/hr	20.00
	GJV	T/c K. Kramer and email D. Schroeder	0.30 320.00/hr	96.00
	GJV	E-mail K. Kramer	0.10 320.00/hr	32.00
9/21/2018	KBK	Review draft subpoena to Kelly Mousley; revise draft subpoena; email to Geoffrey Vitt regarding revised subpoena	0.40 175.00/hr	70.00
	JK	Prepare full draft of Plaintiff's response to Def Interrogatories and Second set of RTP's	1.10 100.00/hr	110.00
	JK	Review documents for relevance to new request from Defendants	2.40 100.00/hr	240.00
9/24/2018	KBK	Receive and review emails from Misty Porter with documents for production; email to Julia Korkus regarding discovery	0.10 175.00/hr	17.50
	KBK	Review discovery drafts from Julia Korkus; revise discovery drafts and send revised documents to Julia Korkus	0.70 175.00/hr	122.50
	KBK	Review Geoffrey Vitt's memo regarding meeting with Misty Porter	0.10 175.00/hr	17.50
	KBK	Emails with Julia Korkus regarding discovery; email to Misty Porter regarding Dartmouth-Health Clinic interrogatories	0.10 175.00/hr	17.50
	JK	Emails, research & edits re: discovery drafts of Plaintiff's responses	0.70 100.00/hr	70.00
	JK	Emails w/ K. Burghardt Kramer re: discovery	0.10 100.00/hr	10.00
	JK	Review documents for relevance to new request from Defendants	4.70 100.00/hr	470.00
9/25/2018	JK	Email to K. Burghardt Kramer re: discovery and relevance	0.20 100.00/hr	20.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/25/2018	JK	Exchange emails w/ R. Bancroft, M. Porter, K. Burghardt Kramer	0.40 100.00/hr	40.00
	JK	Review text messages for relevance to new request from Defendants	3.50 100.00/hr	350.00
9/26/2018	JK	Prepare memo & review new documents for Bancroft re: economic damages; emails w/ M. Porter and R. Bancroft	2.50 100.00/hr	250.00
	SN	Research per GJV privilege	0.60 80.00/hr	48.00
9/27/2018	JK	Review & prepare economic damages documents and emails w/ R. Bancroft and Dr. Porter	1.80 100.00/hr	180.00
	JK	Prepare pension information for R. Bancroft	0.70 100.00/hr	70.00
	JK	Exchange emails w/ R. Bancroft re: economic damages/FTE projections; review information and documents	0.60 100.00/hr	60.00
9/28/2018	KBK	Telephone conference with Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK	Exchange emails with Julia Korkus regarding discovery responses and other discovery issues	0.10 175.00/hr	17.50
	KBK	Receive and review privilege log from Jessica Joseph; email to Geoffrey Vitt regarding same	0.20 175.00/hr	35.00
9/29/2018	GJV	Review D-H objections	0.10 320.00/hr	32.00
9/30/2018	GJV	Review D-H privilege log and review materials on QA privilege	2.50 320.00/hr	800.00
	GJV	Memo on QA privilege and analyze D-H position on privileges	1.20 320.00/hr	384.00
		For professional services rendered	73.40	\$10,545.50
		Additional Charges :		
9/10/2018		US District Court Fee		31.00
		Total costs		\$31.00
		Total amount of this bill		\$10,576.50



Misty Porter

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	<u>Amount</u>
Previous balance	\$25,540.50
9/17/2018 Payment - thank you. Check No. 5260	(\$8,864.50)
Total payments and adjustments	(\$8,864.50)
Balance due	<u>\$27,252.50</u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	12.00	320.00	\$3,840.00
Julia Korkus	49.60	100.00	\$4,960.00
Katherine B. Kramer	9.70	175.00	\$1,697.50
Sarah Nunan	0.60	80.00	\$48.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

November 08, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-13047

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2018	KBK	Receive and review emails from Misty Porter; receive and review emails from Julia Korkus; review final discovery responses and email to Geoffrey Vitt and Julia Korkus	0.30 175.00/hr	52.50
	KBK	Review email from Geoffrey Vitt and Geoffrey Vitt's memorandum regarding QA privilege	1.20 175.00/hr	210.00
	KBK	Research QA privilege and choice of law issues	0.70 175.00/hr	122.50
	KBK	Telephone conference with Geoffrey Vitt; research Vermont QA privilege statute	0.90 175.00/hr	157.50
	JK	Emails w/ MBP and KBK re: additional discovery from MBP; screenshots	0.30 100.00/hr	30.00
	JK	Revise discovery responses for KBK/GJV review re: Plaintiff's Response to Def 2nd Request for Production and D-H Clinic 1st set of Int.	0.50 100.00/hr	50.00
	JK	Research and communications w/ R. Bancroft and M. Porter re: economic damages; prepare information for R. Bancroft	1.80 100.00/hr	180.00
	GJV	Letter to Schroeder	0.30 320.00/hr	96.00
	GJV	Review documents produced	0.30 320.00/hr	96.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2018	GJV	T/c K. Kramer	0.20 320.00/hr	64.00
	GJV	Research re: privilege and prepare draft letter	0.70 320.00/hr	224.00
10/2/2018	KBK	Exchange emails with Geoffrey Vitt regarding response to DHMC's privilege log	0.20 175.00/hr	35.00
	GJV	E-mail K. Kramer	0.10 320.00/hr	32.00
	GJV	Research on A/C privilege and QA privilege	0.40 320.00/hr	128.00
	GJV	Letter to D. Schroeder on privilege issues	1.20 320.00/hr	384.00
10/3/2018	KBK	Exchange emails with Jessica Joseph regarding discovery responses	0.10 175.00/hr	17.50
	SN	Research privilege issues regarding the production log; conf with GJV RE same	1.20 80.00/hr	96.00
	SN	Review privilege log	0.20 80.00/hr	16.00
	JK	Review and research privilege log; email and conf. w/ S. Nunan	0.60 100.00/hr	60.00
	JK	Research and communications w/ R. Bancroft re: economic damages; prepare information for R. Bancroft	2.50 100.00/hr	250.00
	GJV	Research on privilege and QA issue and work on letter	2.60 320.00/hr	832.00
10/4/2018	KBK	Exchange emails with Geoffrey Vitt regarding DHMC privilege log	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt	0.30 175.00/hr	52.50
	KBK	Revise letter to Don Schroeder regarding DHMC privilege log; exchange emails with Jessica Joseph regarding additional production of documents	2.30 175.00/hr	402.50
	JK	Conf. w/ G. Vitt re: privilege log	0.20 100.00/hr	20.00
	JK	Review, research privilege log documents per G. Vitt and damages emails and calls.	1.20 100.00/hr	120.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/4/2018	JK	Research and communications w/ R. Bancroft re: economic damages	0.90 100.00/hr	90.00
	GJV	Research on QA issues and review privilege log of D-H	1.40 320.00/hr	448.00
	GJV	Work on letter to D-H re: privilege and consider jurisdiction issues	1.30 320.00/hr	416.00
10/5/2018	KBK	Exchange emails with Geoffrey Vitt regarding expert report; email to Jessica Joseph regarding document production	0.50 175.00/hr	87.50
	GJV	T/c M. Porter	0.20 320.00/hr	64.00
10/7/2018	GJV	Review D. Schroeder letter and outline	0.20 320.00/hr	64.00
10/8/2018	KBK	Telephone conference with Geoffrey Vitt; email to Misty Porter; telephone conference with Bob Bancroft	0.70 175.00/hr	122.50
	KBK	Telephone conference with Geoffrey Vitt and Bob Bancroft regarding damages	0.70 175.00/hr	122.50
	KBK	Telephone conference with Misty Porter regarding damages	0.70 175.00/hr	122.50
	KBK	Email to Geoffrey Vitt about damages calculation	0.30 175.00/hr	52.50
	JK	Review email from GJV/KBK re: Porter damages and scenarios	0.20 100.00/hr	20.00
	GJV	E-mail and T/c K. Kramer	0.30 320.00/hr	96.00
	GJV	Telephone conference with Dr. Bancroft and K. Kramer and email D. Schroeder	0.60 320.00/hr	192.00
	GJV	E-mails re: Dr. Bancroft and damage analysis	0.20 320.00/hr	64.00
	GJV	E-mails	0.20 320.00/hr	64.00
10/9/2018	KBK	Receive conference call invite from Jessica Joseph; receive and review email from Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt	0.50 175.00/hr	87.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/10/2018	KBK Review email from Geoffrey Vitt regarding damages	0.10 175.00/hr	17.50
	JK Prepare document discovery response	1.00 100.00/hr	100.00
	GJV Analysis of damages and emails to M. Porter and K. Kramer	0.90 320.00/hr	288.00
10/11/2018	KBK Review emails from Misty Porter regarding damages calculations	0.20 175.00/hr	35.00
	KBK Telephone conference with Don Schroeder, Jessica Joseph and Geoffrey Vitt regarding privilege log; telephone conference with Geoffrey Vitt regarding DHMC privilege log	0.70 175.00/hr	122.50
	KBK Research quality assurance privilege under New Hampshire law	0.50 175.00/hr	87.50
	GJV Review QA issue and jurisdiction and conf. call K. Kramer, D. Schroeder, and J. Joseph; research	2.30 320.00/hr	736.00
10/12/2018	KBK Telephone conference with Misty Porter and Geoffrey Vitt regarding damages	1.20 175.00/hr	210.00
	KBK Review partial transcript of Porter oral argument on motion for ex parte interviews	0.20 175.00/hr	35.00
	GJV Conference with M. Porter and K. Kramer	1.50 320.00/hr	480.00
	GJV Memorandum on discovery and meeting	0.50 320.00/hr	160.00
10/13/2018	GJV Review memorandum on damages and Dr. Bancroft damages analysis	0.60 320.00/hr	192.00
10/15/2018	KBK Review memorandum from Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK Telephone conference with Geoffrey Vitt and Bob Bancroft; prepare notes of telephone conference	0.70 175.00/hr	122.50
	KBK Review hearing transcript from hearing on motion for ex parte interviews	0.20 175.00/hr	35.00
	KBK Conference call with Don Schroeder, Jessica Joseph and Geoffrey Vitt regarding discovery issues	0.40 175.00/hr	70.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/15/2018	KBK Telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
	GJV Review A/C issues and research on QA privilege	0.70 320.00/hr	224.00
	GJV T/c D. Schroeder and K. Kramer; t/c K. Kramer and review notes	0.80 320.00/hr	256.00
10/17/2018	KBK Email to Jessica Joseph and Don Schroeder regarding discovery	0.10 175.00/hr	17.50
	KBK Meeting with Julia Korkus and Geoffrey Vitt regarding discovery	0.50 175.00/hr	87.50
	JK Conf. W/ KBK and GJV re: informal interviews, matter status (GJV there for part); start informal interviews on Friday	0.50 100.00/hr	50.00
	JK Review Defendants' Responses to Plaintiff's Second Requests for Documents	0.50 100.00/hr	50.00
10/18/2018	KBK Review Dartmouth-Hitchcock's response to plaintiff's second requests for documents; email to Geoffrey Vitt regarding same	0.50 175.00/hr	87.50
	KBK Research quality assurance privilege under New Hampshire law	0.50 175.00/hr	87.50
	JK Review KBK email re: DH document production response	0.10 100.00/hr	10.00
10/19/2018	KBK Receive and review letter from Don Schroeder regarding privilege log; Telephone conference with Geoffrey Vitt; Emails with Geoffrey Vitt regarding second set of requests to produce	0.30 175.00/hr	52.50
	GJV Review documents and responses of D-H and K. Kramer email and respond	0.30 320.00/hr	96.00
10/22/2018	KBK Review revised privilege log from Jessica Joseph; email to Geoffrey Vitt regarding privilege log; draft letter to Don Schroeder regarding response to plaintiff's second set of requests to produce	2.70 175.00/hr	472.50
	KBK Exchange emails with Misty Porter regarding damages	0.20 175.00/hr	35.00
10/23/2018	KBK E-mail to Misty Porter regarding damages	0.10 175.00/hr	17.50
10/24/2018	KBK Exchange emails with Misty Porter regarding damages	0.10 175.00/hr	17.50



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/24/2018	GJV	T/c J. Murphy, MD and email M. Porter and K. Kramer; review M. Porter email	0.30 320.00/hr	96.00
10/25/2018	KBK	Receive and review emails from Misty Porter and Geoffrey Vitt regarding damages	0.10 175.00/hr	17.50
10/28/2018	GJV	Emails and damages issue	0.20 320.00/hr	64.00
10/29/2018	KBK	Receive and review emails from Geoffrey Vitt; telephone conference with Bob Bancroft regarding damages; email to Geoffrey Vitt regarding damages	0.40 175.00/hr	70.00
	GJV	T/c Dr. Murphy and email M. Porter and K. Kramer	0.20 320.00/hr	64.00
10/30/2018	KBK	Telephone conference with Geoffrey Vitt; email to Julia Korkus	0.40 175.00/hr	70.00
	KBK	Receive and review draft expert report from Bob Bancroft; telephone conference with Bob Bancroft; exchange messages with Misty Porter regarding draft expert report	0.70 175.00/hr	122.50
	KBK	Telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
	JK	Receive and review Dr. Porter Draft Report from R. Bancroft	0.30 100.00/hr	30.00
	GJV	Several emails re: Dr. Bancroft report	0.20 320.00/hr	64.00
	GJV	T/c K. Kramer; conference S. Nunan re: research on QA privilege	0.30 320.00/hr	96.00
	GJV	Review Dr. Bancroft draft report and email K. Kramer	0.40 320.00/hr	128.00
10/31/2018	KBK	Exchange emails with Misty Porter regarding expert report; telephone conference with Misty Porter regarding expert report; email to Geoffrey Vitt	0.90 175.00/hr	157.50
	KBK	Email to Misty Porter regarding quality assurance privilege; telephone conference with Bob Bancroft regarding expert report	0.30 175.00/hr	52.50
	GJV	E-mails	0.20 320.00/hr	64.00
For professional services rendered			<u>53.70</u>	<u>\$11,311.50</u>



Misty Porter

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## Additional Charges :

	<u>Amount</u>
10/3/2018 Electronic research charges.	39.92
10/8/2018 Conference Call	6.77
10/15/2018 Transcript Cost: Seacoast Transcription	174.25
Conference Call	7.04
10/30/2018 Economic analysis Consultation & Report - Robert L. Bancroft, Ph.D	2,678.00
Total costs	<u>\$2,905.98</u>
Total amount of this bill	<u>\$14,217.48</u>
Previous balance	<u>\$27,252.50</u>
11/1/2018 Payment - thank you. Check No. 5278	<u>(\$8,576.50)</u>
Total payments and adjustments	<u>(\$8,576.50)</u>
Balance due	<u><u>\$32,893.48</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	19.60	320.00	\$6,272.00
Julia Korkus	10.60	100.00	\$1,060.00
Katherine B. Kramer	22.10	175.00	\$3,867.50
Sarah Nunan	1.40	80.00	\$112.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

December 17, 2018

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-13140

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2018	KBK Research quality assurance privilege under New Hampshire law	1.00 175.00/hr	175.00
11/2/2018	GJV Review privilege log and outline the response to D-H	0.30 320.00/hr	96.00
11/6/2018	GJV Prepare for call with D. Schroeder re: D-H objection to second requests; t/c KBK; t/c D. Schroeder, J. Joseph and KBK re: objections	1.10 320.00/hr	352.00
	KBK Prepare for phone call with Don Schroeder regarding discovery dispute; telephone conference with Geoffrey Vitt; email to Don Schroeder to memorialize agreement	1.20 175.00/hr	210.00
11/7/2018	SN Caselaw research on quality assurance in NH	1.70 80.00/hr	136.00
	SN Conf with GJV RE research	0.10 80.00/hr	8.00
	GJV Research on QA privilege and email K. Kramer re: draft email to D. Schroeder	0.60 320.00/hr	192.00
11/8/2018	GJV Review draft to J. Joseph and D. Schroeder re: QA privilege	0.20 320.00/hr	64.00
	KBK Exchange emails with Geoffrey Vitt regarding quality assurance privilege; email to Don Schroeder and Jessica Joseph regarding interrogatory responses; prepare response to Don Schroeder regarding quality assurance privilege; email to Don	1.50 175.00/hr	262.50

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Schroeder and Jessica Joseph regarding quality assurance privilege		
11/9/2018	GJV	E-mail from D-H lawyer re: discovery answers	0.10 320.00/hr	32.00
	KBK	Exchange emails with Jessica Joseph regarding D-H Clinic's responses to interrogatories	0.10 175.00/hr	17.50
11/13/2018	KBK	Exchange emails with Misty Porter and Geoffrey Vitt regarding Leslie DeMars	0.10 175.00/hr	17.50
11/14/2018	KBK	Exchange emails with Geoffrey Vitt regarding status and next steps; exchange emails with Don Schroeder regarding quality assurance privilege	0.30 175.00/hr	52.50
	GJV	Email K. Kramer and review privilege issue	0.20 320.00/hr	64.00
	GJV	E-mails with K. Kramer and review privilege questions	0.40 320.00/hr	128.00
11/15/2018	GJV	Privilege issue	0.30 320.00/hr	96.00
11/16/2018	KBK	Receive and review emails from Geoffrey Vitt and Misty Porter regarding scheduling order; receive and review Dartmouth Hitchcock Clinic's response to plaintiff's interrogatories and exchange emails with Misty Porter regarding same	0.50 175.00/hr	87.50
	GJV	E-mails re. possible motion	0.20 320.00/hr	64.00
11/17/2018	SM	Review G. Vitt emails re: status and scope of research	0.10 200.00/hr	20.00
11/19/2018	KBK	Receive and review email from Jessica Joseph regarding quality assurance privilege; email to Geoffrey Vitt regarding same	0.40 175.00/hr	70.00
11/20/2018	KBK	Receive and review email from Misty Porter regarding discovery	0.10 175.00/hr	17.50
11/21/2018	GJV	Motion to compel re: Privilege Log	1.70 320.00/hr	544.00
11/24/2018	GJV	Review Privilege Log and research on QA privilege	1.80 320.00/hr	576.00
11/25/2018	SM	Review G. Vitt email re: categories of production withheld and applicable law	0.20 200.00/hr	40.00
	GJV	Research; email M. Porter and K. Kramer and work on motion re. QA issue	2.00 320.00/hr	640.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2018	KBK Telephone conference with Geoffrey Vitt	0.30 175.00/hr	52.50
	KBK Exchange emails with Geoffrey Vitt regarding interrogatories and quality assurance privilege	0.40 175.00/hr	70.00
	JK Review GJV email and prepare documents for review re: motion to compel and privilege log	3.40 100.00/hr	340.00
	GJV Review Privilege Log and outline motion to compel	0.80 320.00/hr	256.00
	GJV Review interrogatory answers and draft email to D. Schroeder re: incomplete and inadequate answers	0.40 320.00/hr	128.00
	GJV Review redacted documents included on the Privilege Log	1.30 320.00/hr	416.00
	GJV T/c K. Kramer and review J. Joseph email re: coordinating schedules and amendment	0.30 320.00/hr	96.00
11/27/2018	KBK Exchange emails with Geoffrey Vitt regarding draft correspondence to Don Schroeder and Jessica Joseph	0.10 175.00/hr	17.50
	JK Emails w/ G. Vitt on QA privilege, claims and evidence; document search and review. Update native email logs; review call questions	4.20 100.00/hr	420.00
	GJV Email K. Kramer re: draft to D. Schroeder re: D-H answers to interrogatories	0.20 320.00/hr	64.00
	GJV Review K. Kramer email and email D. Schroeder and J. Joseph re: D-H interrogatory answers	0.20 320.00/hr	64.00
	GJV Review redacted documents	1.10 320.00/hr	352.00
11/28/2018	KBK Receive and review email from Misty Porter regarding quality assurance documents; Exchange emails with Jessica Joseph regarding scheduling order	0.30 175.00/hr	52.50
	JK Review Porter comments, update claims chart, re: redacted QA privilege documents	0.30 100.00/hr	30.00
11/29/2018	GJV E-mails	0.10 320.00/hr	32.00
11/30/2018	KBK Telephone conference with Geoffrey Vitt in preparation for meet-and-confer; review set of redacted/privileged documents from Dartmouth-Hitchcock for preparing motion to compel	1.10 175.00/hr	192.50

Misty Porter

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	<u>Hrs/Rate</u>	<u>Amount</u>
11/30/2018 KBK Telephone conference with Geoffrey Vitt, Don Schroeder and Jessica Joseph regarding D-H Clinic interrogatory responses	0.20 175.00/hr	35.00
GJV T/c K. Kramer re: conference call with D. Schroeder	0.10 320.00/hr	32.00
GJV Conference call with K. Kramer, D. Schroeder, and J. Joseph	0.40 320.00/hr	128.00
For professional services rendered	31.40	\$6,740.00
Additional Charges :		
11/7/2018 Electronic research charges.		502.67
11/26/2018 Electronic research charges.		55.52
Total costs		<u>\$558.19</u>
Total amount of this bill		<u>\$7,298.19</u>
Previous balance		<u>\$32,893.48</u>
11/14/2018 Payment - thank you. Check No. 5283		<u>(\$12,717.48)</u>
Total payments and adjustments		<u>(\$12,717.48)</u>
Balance due		<u><u>\$27,474.19</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	13.80	320.00	\$4,416.00
Julia Korkus	7.90	100.00	\$790.00
Katherine B. Kramer	7.60	175.00	\$1,330.00
Sarah Nunan	1.80	80.00	\$144.00
Sarah Merlo	0.30	200.00	\$60.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

January 10, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2018-13189

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2018	SM	Research NH law re: QA privilege; review Knapik decision	1.80 200.00/hr	360.00
12/3/2018	GJV	Review Amended Complaint and email S. Merlo re: research issue	0.20 320.00/hr	64.00
	SM	Emails with G. Vitt re: preliminary thoughts on applicable privilege law	0.20 200.00/hr	40.00
12/4/2018	KBK	Review proposed scheduling order from Jessica Joseph; email to Jessica Joseph regarding same	0.10 175.00/hr	17.50
	GJV	Work on motion to compel	1.80 320.00/hr	576.00
12/5/2018	KBK	Exchange emails with Geoffrey Vitt regarding quality assurance privilege and attorney-client privilege issues	0.30 175.00/hr	52.50
	GJV	Motion to compel and review produced documents	1.80 320.00/hr	576.00
	JK	Review email from G. Vitt and preparation for informal interviews	1.60 100.00/hr	160.00
12/6/2018	KBK	Receive and review motion to amend discovery schedule	0.10 175.00/hr	17.50

Vitt & Associates, PLC  
8 Beaver Meadow Road, PO Box 1229, Norwich, VT 05055 802-649-5700 ~ Fax 802-649-1692  
PO Box 349, Hanover, NH 03755 603-640-6173 [www.vittandassociates.com](http://www.vittandassociates.com)



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/6/2018	GJV	Motion to compel and review documents produced	0.90 320.00/hr	288.00
	JK	Receive and review new discovery schedule	0.20 100.00/hr	20.00
12/7/2018	KBK	Exchange emails with Misty Porter regarding departure of Leslie DeMars from DHMC; Exchange emails with Jessica Joseph regarding document production	0.20 175.00/hr	35.00
	JK	Emails/DH notice re: DeMars departure from DHMC	0.20 100.00/hr	20.00
12/8/2018	GJV	Motion to compel research and drafting	1.80 320.00/hr	576.00
	SM	E-mails with G. Vitt re: state versus federal privilege laws	0.10 200.00/hr	20.00
	SM	Research re: QA privilege and choice/conflict of laws	3.00 200.00/hr	600.00
	JK	Emails w/ G. Vitt re: interviews	0.10 100.00/hr	10.00
12/9/2018	GJV	Motion to Compel	0.40 320.00/hr	128.00
12/10/2018	SM	Research re: QA privilege	5.00 200.00/hr	1,000.00
	JK	Review documents for employee selection and lay-off discussions	2.60 100.00/hr	260.00
12/11/2018	KBK	Exchange emails with Misty Porter regarding grant update and funding issues; email to Bob Bancroft with update on grant funding; review email from Geoffrey Vitt regarding quality assurance privilege and other issues; review memorandum from Sarah Merlo on quality assurance privilege; email to Geoffrey Vitt regarding same; email to Sarah Merlo regarding quality assurance privilege	0.80 175.00/hr	140.00
	GJV	E-mails	0.20 320.00/hr	64.00
	GJV	Emails with M. Porter; review S. Merlo memorandum on law applicable and email K. Kramer	1.20 320.00/hr	384.00
	GJV	Several emails with K. Kramer	0.30 320.00/hr	96.00
	SM	Draft memorandum re: privilege; email to G. Vitt	1.50 200.00/hr	300.00



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/12/2018	KBK	Review emails and research regarding quality assurance privilege for preparing motion to compel; two telephone conferences with Geoffrey Vitt	0.80 175.00/hr	140.00
	GJV	T/c K. Kramer	0.20 320.00/hr	64.00
	GJV	T/c K. Kramer	0.30 320.00/hr	96.00
12/13/2018	GJV	Research	0.20 320.00/hr	64.00
	SM	E-mails with K. Kramer re: impact of Knapik on federal privilege argument	0.30 200.00/hr	60.00
12/14/2018	KBK	Meeting with Geoffrey Vitt regarding motion to compel and other issues	0.20 175.00/hr	35.00
	GJV	Motion to compel and research on privilege issues	1.30 320.00/hr	416.00
12/15/2018	GJV	Motion to compel	2.20 320.00/hr	704.00
12/16/2018	GJV	Motion to compel	1.80 320.00/hr	576.00
12/17/2018	KBK	Exchange emails with Geoffrey Vitt regarding DHMC's expert report	0.10 175.00/hr	17.50
	GJV	Motion to compel and research re: privilege	0.80 320.00/hr	256.00
	SM	E-mails with G. Vitt re: 2d Circuit case law re: burden	0.10 200.00/hr	20.00
	SM	Research re: burden and QA privilege	0.40 200.00/hr	80.00
12/18/2018	KBK	Email to Jessica Joseph and Don Schroeder regarding defendant's expert report and document production status; draft section of motion to compel regarding quality assurance privilege; exchange emails with Geoffrey Vitt regarding motion to compel	0.30 175.00/hr	52.50
	SM	Research re: burden and QA privilege	0.30 200.00/hr	60.00
	SM	E-mails with G. Vitt re: burden in the 2d Cir	0.10 200.00/hr	20.00

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Misty Porter

		<u>Hrs/Rate</u>	<u>Amount</u>
12/18/2018	GJV Work on motion to compel	0.80 320.00/hr	256.00
12/19/2018	KBK Briefly review motion to compel from Geoffrey Vitt; exchange emails with Geoffrey Vitt; exchange emails with Jessica Joseph regarding expert report and discovery issues	0.20 175.00/hr	35.00
12/20/2018	KBK Draft motion to compel as to privileged documents; telephone conference with Geoffrey Vitt regarding motion to compel	6.90 175.00/hr	1,207.50
	GJV Outline for motion	0.20 320.00/hr	64.00
	GJV T/c K. Kramer re: motion	0.20 320.00/hr	64.00
	GJV Work on motion to compel	0.20 320.00/hr	64.00
12/21/2018	KBK Revise and finalize motion to compel as to QA and attorney-client privileged documents	1.10 175.00/hr	192.50
	GJV Motion to Compel	1.00 320.00/hr	320.00
12/28/2018	KBK Exchange emails with Jessica Joseph and Geoffrey Vitt regarding extension of response time for motion to compel	0.10 175.00/hr	17.50
	For professional services rendered	46.50	\$10,686.00
	Additional Charges :		
12/8/2018	Electronic research charges.		413.28
12/10/2018	Electronic research charges.		213.98
12/11/2018	Electronic research charges.		56.52
12/17/2018	Electronic research charges.		63.50
12/18/2018	Electronic research charges.		66.98
	Total costs		<u>\$814.26</u>
	Total amount of this bill		<u>\$11,500.26</u>
	Previous balance		\$27,474.19
12/27/2018	Payment - thank you. Check No. 5300		(\$5,740.00)

Misty Porter

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Amount

Total payments and adjustments

(\$5,740.00)

Balance due

\$33,234.45Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	17.80	320.00	\$5,696.00
Julia Korkus	4.70	100.00	\$470.00
Katherine B. Kramer	11.20	175.00	\$1,960.00
Sarah Merlo	12.80	200.00	\$2,560.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

February 11, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13259

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
1/1/2019	GJV	Motion to compel	0.80 320.00/hr	256.00
1/2/2019	GJV	E-mails with K. Kramer re: motion to compel and revise second motion to compel and review draft of GJV affidavit	1.20 320.00/hr	384.00
	GJV	E-mails and research	0.20 320.00/hr	64.00
	GJV	Several emails and prepare motion to compel and affidavit	0.90 320.00/hr	288.00
	KBK	Receive and review stipulated motion for extension of time for DHMC to file response to motion to compel; exchange emails with Geoffrey Vitt regarding motion to compel; draft Rule 26(c)(3) affidavit; exchange emails with Geoffrey Vitt regarding motion to compel interrogatory responses; research regarding DHMC's objection to interrogatory responses	2.90 175.00/hr	507.50
1/3/2019	GJV	Review K. Kramer emails re: case authority and revise motion to dismiss	1.00 320.00/hr	320.00
	GJV	Motion to compel	0.90 320.00/hr	288.00
	GJV	E-mails	0.20 320.00/hr	64.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2019	GJV	Revise motion	0.10 320.00/hr	32.00
	KBK	Review and revise motion to compel interrogatory response; exchange emails with Geoffrey Vitt regarding motion	1.10 175.00/hr	192.50
1/4/2019	JK	Email w/ K. Burghardt Kramer	0.10 100.00/hr	10.00
	GJV	Review motion to compel	0.20 320.00/hr	64.00
	KBK	Exchange emails with Liz Bower and Geoffrey Vitt regarding motion to compel interrogatory response; receive and review filed version of motion to compel interrogatory responses; receive and review email from Jessica Joseph regarding document production; exchange emails with Jessica Joseph regarding same	0.30 175.00/hr	52.50
1/7/2019	KBK	Receive and review email from Jessica Joseph regarding motion to compel interrogatory response; receive and review email from Jessica Joseph with document production; download final batch of documents from DHMC	0.20 175.00/hr	35.00
1/8/2019	JK	Receive production files from Defense; research.	1.30 100.00/hr	130.00
1/9/2019	JK	Email w/ K. Burghardt Kramer and conf. w/ S. Nunan on production	0.20 100.00/hr	20.00
	GJV	E-mail to K. Kramer re: discovery deadline and problems with D-H production	0.30 320.00/hr	96.00
	KBK	Exchange emails with Julia Korkus regarding document production	0.10 175.00/hr	17.50
1/10/2019	JK	Email w/ K. Burghardt Kramer	0.10 100.00/hr	10.00
1/11/2019	KBK	Call Julia Korkus and leave message; telephone conference with Geoffrey Vitt regarding discovery	0.10 175.00/hr	17.50
	GJV	T/c K. Kramer re: motion, discovery, deadlines	0.30 320.00/hr	96.00
1/14/2019	KBK	Receive and briefly review DHMC's opposition to motion to compel QA discovery responses	0.10 175.00/hr	17.50
1/15/2019	KBK	Review DHMC's response to plaintiff's motion to compel QA documents; draft reply brief	3.00 175.00/hr	525.00
1/22/2019	JK	Phone conf. W/ KBK re: claims, witnesses, and planning; meeting notes and research	1.70 100.00/hr	170.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/22/2019	JK Combining and reviewing ninth production	3.50 100.00/hr	350.00
	KBK Telephone conference with Julia Korkus regarding strategy and discovery issues	1.30 175.00/hr	227.50
1/23/2019	JK Combining production files for review	0.80 100.00/hr	80.00
1/24/2019	JK Combining production files for review	0.50 100.00/hr	50.00
	GJV Motion to compel	0.30 320.00/hr	96.00
1/25/2019	JK Combining production files; review ninth production	2.70 100.00/hr	270.00
	SM Review G. Vitt email re: reply brief and D-H position re: controlling law	0.10 200.00/hr	20.00
	KBK Exchange emails with Misty Porter; telephone conference with Geoffrey Vitt	0.40 175.00/hr	70.00
	GJV Review draft motion	0.30 320.00/hr	96.00
	GJV Review draft reply brief and t/c K. Kramer re: motion to compel on privilege	0.70 320.00/hr	224.00
1/26/2019	KBK Revise reply brief; exchange emails with Misty Porter	0.20 175.00/hr	35.00
1/27/2019	SM Review D-H opposition to motion to compel and draft reply	1.00 200.00/hr	200.00
	SM Research re: controlling law	1.10 200.00/hr	220.00
	SM E-mail to G. Vitt with comments on draft reply	0.50 200.00/hr	100.00
	GJV Review reply memorandum	0.30 320.00/hr	96.00
1/28/2019	JK Review ninth production from Defense	2.20 100.00/hr	220.00
	KBK Review DHMC's response to motion to compel interrogatory responses; draft reply brief; exchange emails with Liz Bower regarding filing of reply in support of motion to compel QA documents	0.40 175.00/hr	70.00

Misty Porter

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/28/2019 GJV Review draft reply memorandum	0.10 320.00/hr	32.00
For professional services rendered	33.70	\$6,113.50
Additional Charges :		
1/27/2019 Electronic research charges.		127.04
Total costs		\$127.04
Total amount of this bill		\$6,240.54
Previous balance		\$33,234.45
1/17/2019 Payment - thank you. Check No. 5237		(\$9,000.00)
Total payments and adjustments		(\$9,000.00)
Balance due		\$30,474.99

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	7.80	320.00	\$2,496.00
Julia Korkus	13.10	100.00	\$1,310.00
Katherine B. Kramer	10.10	175.00	\$1,767.50
Sarah Merlo	2.70	200.00	\$540.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

March 06, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13331

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
2/4/2019	KBK	Email to Geoffrey Vitt regarding motion to compel interrogatory response	0.10 175.00/hr	17.50
2/5/2019	KBK	Draft reply to motion to compel interrogatory response; email draft brief to Geoffrey Vitt and Julia Korkus	1.70 175.00/hr	297.50
2/7/2019	GJV	Review draft reply memorandum and email K. Kramer with comments	0.30 320.00/hr	96.00
	KBK	Exchange emails with Misty Porter; revise reply brief in support of motion to compel; exchange emails with Geoffrey Vitt regarding reply brief	0.40 175.00/hr	70.00
2/8/2019	GJV	Review revised reply memorandum	0.30 320.00/hr	96.00
	GJV	T/c K. Kramer re: reply memorandum	0.20 320.00/hr	64.00
	KBK	Review discovery deadlines; telephone conference with Geoffrey Vitt regarding deadlines; email to Jessica Joseph regarding deadlines	0.20 175.00/hr	35.00
2/20/2019	KBK	Exchange emails with Geoffrey Vitt regarding motions to compel and other discovery issues	0.30 175.00/hr	52.50
	GJV	Several emails re: subpoena, motion and discovery schedule	0.20 320.00/hr	64.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2019	KBK Email to court clerk regarding oral argument on motions to compel	0.10 175.00/hr	17.50
	JK Review email from G. Vitt and subpoenas on Hsu and Seifer; provide comment.	0.30 100.00/hr	30.00
	GJV E-mails	0.10 320.00/hr	32.00
	GJV Subpoena for Hsu and Seifer	0.50 320.00/hr	160.00
2/25/2019	KBK Exchange emails with court clerk, Jessica Joseph, and Geoffrey Vitt regarding hearing dates on motions to compel	0.30 175.00/hr	52.50
	GJV Multiple emails with J Joseph, K. Kramer and clerk	0.20 320.00/hr	64.00
	GJV Numerous emails with opposing counsel and clerk re: argument	0.20 320.00/hr	64.00
2/26/2019	GJV Receive and review email from Jessica Joseph regarding hearing dates; email to court clerk and attorneys regarding hearing dates; email Misty Porter with update on motions to compel	0.30 320.00/hr	96.00
	KBK Telephone conference with Misty Porter regarding status and next steps	0.20 175.00/hr	35.00
	GJV Several emails and T.c K. Kramer re: argument issues	0.20 320.00/hr	64.00
	GJV E-mails	0.10 320.00/hr	32.00
2/28/2019	KBK Receive and review email from court clerk regarding timing of ruling on motions to compel; email to Misty Porter and Geoffrey Vitt regarding same; receive and review email from Geoffrey Vitt regarding ruling	0.10 175.00/hr	17.50
	GJV Several emails with K. Kramer and clerk of court	0.20 320.00/hr	64.00
	For professional services rendered	6.50	\$1,521.00
	Previous balance		\$30,474.99
2/20/2019	Payment - thank you. Check No. 5250		(\$6,240.54)
	Total payments and adjustments		(\$6,240.54)

Misty Porter

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Amount

Balance due

\$25,755.45Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	2.80	320.00	\$896.00
Julia Korkus	0.30	100.00	\$30.00
Katherine B. Kramer	3.40	175.00	\$595.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

April 10, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13357

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
3/1/2019	JK Review ninth production discovery documents from D-H.	3.20 100.00/hr	320.00
3/4/2019	JK Review discovery documents from D-H: ninth production.	3.70 100.00/hr	370.00
3/5/2019	JK Review discovery documents from D-H: ninth production.	3.80 100.00/hr	380.00
3/7/2019	JK Review discovery documents from D-H: ninth production.	4.10 100.00/hr	410.00
3/8/2019	JK Review discovery documents from D-H: ninth production.	3.50 100.00/hr	350.00
3/11/2019	KBK Receive and review court decision granting motions to compel; email to Misty Porter with decision and analysis; telephone conference with Geoffrey Vitt regarding decision; receive and review email from Misty Porter regarding decision	0.60 175.00/hr	105.00
	JK Review discovery documents from D-H: ninth production.	4.00 100.00/hr	400.00
	GJV Review decision and email K. Kramer and M. B. Porter	0.30 320.00/hr	96.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/11/2019	GJV	T/c K. Kramer	0.10 320.00/hr	32.00
3/12/2019	KBK	Exchange emails with Jessica Joseph regarding discovery schedule; meeting with Geoffrey Vitt regarding discovery schedule	0.30 175.00/hr	52.50
	JK	Review discovery documents from D-H: ninth production.	3.80 100.00/hr	380.00
	GJV	Review discovery issue	0.10 320.00/hr	32.00
	GJV	Review motions to compel and proposed dates for revised Discovery Plan including ENE and email M. B. Porter	0.50 320.00/hr	160.00
3/13/2019	JK	Review discovery documents from D-H: ninth production.	4.00 100.00/hr	400.00
	GJV	E-mail M. B. Porter and email S. Nunan and J. Korkus re: documents to be produced	0.30 320.00/hr	96.00
	GJV	E-mails	0.20 320.00/hr	64.00
3/14/2019	JK	Review discovery documents from D-H: ninth production.	4.30 100.00/hr	430.00
3/16/2019	GJV	Outline for meeting on Monday re: witnesses and depositions	0.80 320.00/hr	256.00
3/17/2019	GJV	Outline for deposition preparation and witness interviews	2.70 320.00/hr	864.00
	GJV	Review timelines and deposition issues	0.40 320.00/hr	128.00
3/18/2019	KBK	Email to Geoffrey Vitt and Julia Korkus regarding discovery meeting; receive and review email from Misty Porter regarding deposition dates; email to Jessica Joseph and Don Schroeder regarding discovery schedule and deposition dates for Misty Porter	1.00 175.00/hr	175.00
	KBK	Travel to Norwich for team meeting regarding discovery	1.50 175.00/hr	262.50
	KBK	Travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Team meeting with Geoffrey Vitt, Julia Korkus and Sarah Nunan regarding discovery plan	1.40 175.00/hr	245.00

Misty Porter

Page 3

			<u>Hrs/Rate</u>	<u>Amount</u>
3/18/2019	KBK	Email to Misty Porter regarding discovery and next steps; email to Don Schroeder and Jessica Joseph regarding depositions and dates	0.40 175.00/hr	70.00
	SN	Conf with GJV RE preparing for upcoming discovery	0.40 80.00/hr	32.00
	SN	Preparing documents for meeting with KBK, GJV and JK	0.30 80.00/hr	24.00
	SN	Meeting with GJV, KBK, and JK RE proceeding with discovery plan	2.20 80.00/hr	176.00
	JK	Prepare and conference w/ G. Vitt, K.B. Kramer, S.Nunan discovery status and deposition planning.	2.70 100.00/hr	270.00
	JK	Review Production No. 9 documents	2.10 100.00/hr	210.00
	GJV	Outline for meeting	0.30 320.00/hr	96.00
	GJV	Conference with K. Kramer, J. Korkus, and S. Nunan	2.20 320.00/hr	704.00
3/19/2019	JK	Upload ninth production to Sharefile - sync sharefile and worldox for all production; update production log.	1.60 100.00/hr	160.00
	JK	Review discovery documents from D-H: ninth production.	2.70 100.00/hr	270.00
3/20/2019	JK	Review discovery documents from D-H: ninth production.	3.80 100.00/hr	380.00
3/21/2019	KBK	Exchange emails with Jessica Joseph regarding deposition dates	0.10 175.00/hr	17.50
	KBK	Create chart of claims	1.60 175.00/hr	280.00
	JK	Review discovery documents from D-H: ninth production.	4.20 100.00/hr	420.00
3/22/2019	KBK	Draft chart of claims and elements	3.50 175.00/hr	612.50
	KBK	Receive and review email from Jessica Joseph regarding discovery dates; telephone conference with Geoffrey Vitt; email to Jessica Joseph regarding discovery dates; email to Misty Porter regarding deposition date; telephone conference with Misty Porter; telephone conference with Geoffrey Vitt; exchange emails with Don Schroeder regarding discovery schedule	1.00 175.00/hr	175.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2019	GJV	E-mails and t/c K. Kramer	0.20 320.00/hr	64.00
	JK	Review discovery documents from D-H: ninth production.	3.40 100.00/hr	340.00
3/24/2019	GJV	Draft subpoenas to Dr. Seifer and Dr. Hsu	0.50 320.00/hr	160.00
3/25/2019	KBK	Exchange emails with Don Schroeder regarding discovery schedule	0.20 175.00/hr	35.00
	KBK	Prepare chart of claims; prepare disability timeline; email to Don Schroeder and Jessica Joseph regarding interrogatory responses	2.90 175.00/hr	507.50
	GJV	Review subpoena specifications for Seifer and Hsu	0.80 320.00/hr	256.00
3/26/2019	KBK	Receive and review email from Don Schroeder regarding discovery schedule; email to Misty Porter regarding Ira Bernstein; email to Don Schroeder regarding discovery schedule	0.60 175.00/hr	105.00
	KBK	Exchange emails with Misty Porter regarding additional witnesses; telephone conference with Geoffrey Vitt regarding discovery	0.40 175.00/hr	70.00
	KBK	Review and revise subpoena drafts from Geoffrey Vitt; review DHMC's answer to interrogatory #8 from Plaintiff's Second Set of Interrogatories and exchange emails with Misty Porter regarding same	1.20 175.00/hr	210.00
	GJV	E-mails	0.20 320.00/hr	64.00
	GJV	E-mails with K. Kramer	0.10 320.00/hr	32.00
	GJV	T/c K. Kramer	0.10 320.00/hr	32.00
	GJV	Review letter, answers and t/c K. Kramer	0.20 320.00/hr	64.00
	GJV	E-mails	0.20 320.00/hr	64.00
3/27/2019	KBK	Review production of quality assurance documents from DHMC; review correspondence from DHMC to Judge Crawford regarding attorney-client documents; telephone conference with Geoffrey Vitt regarding discovery; review quality assurance documents	2.80 175.00/hr	490.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/27/2019	KBK Review draft subpoenas of Albert Hsu and David Seifer; draft motion for attorney's fees pursuant to Rule 37 in relation to motion to compel; telephone conference with Natasha Sen; email to Geoffrey Vitt and Julia Korkus regarding notes from telephone conference with Natasha Sen	2.50 175.00/hr	437.50
	KBK Draft motion for attorney's fees; exchange emails with Geoffrey Vitt regarding discovery	1.80 175.00/hr	315.00
	KBK Exchange multiple emails with Geoffrey Vitt regarding discovery; email to Jessica Joseph and Don Schroeder regarding deposition dates; email to Misty Porter regarding witnesses for depositions	0.70 175.00/hr	122.50
	JK Receive and review emails from G. Vitt and K. B. Kramer on D-H production of QA documents and witness preparation	0.50 100.00/hr	50.00
	GJV Review subpoenas to Seifer and Hsu	0.50 320.00/hr	160.00
	GJV T/c K. Kramer re: QA documents	0.10 320.00/hr	32.00
	GJV Review several QA documents from defendants	0.30 320.00/hr	96.00
	GJV K. Kramer e-mail and attachments	0.20 320.00/hr	64.00
	GJV Review subpoena	0.20 320.00/hr	64.00
	GJV Review QA documents	0.20 320.00/hr	64.00
	GJV Review multiple emails re: QA documents and subpoena	0.40 320.00/hr	128.00
3/28/2019	KBK E-mail to Geoffrey Vitt regarding depositions	0.20 175.00/hr	35.00
	KBK Review additional quality assurance documents produced by DHMC; exchange emails with Jessica Joseph and others regarding discovery issues; draft email to Don Schroeder and Jessica Joseph regarding interrogatories; review additional quality assurance documents; exchange emails with Jessica Joseph regarding document production	1.50 175.00/hr	262.50
	KBK Draft motion for attorney's fees; send quality assurance documents to Liz Bower	2.00 175.00/hr	350.00
	PGL Review draft motion	0.20 200.00/hr	40.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2019	GJV E-mails with K. Kramer	0.20 320.00/hr	64.00
	GJV Review QA documents from defendants and emails with K. Kramer	1.10 320.00/hr	352.00
3/29/2019	KBK Exchange emails with Geoffrey Vitt regarding discovery and additional interrogatories; review additional quality assurance documents	1.60 175.00/hr	280.00
	KBK Receive and review deposition notice for Misty Porter; exchange emails with Geoffrey Vitt; email to Don Schroeder regarding deposition of Misty Porter; email to Don Schroeder and Jessica Joseph regarding interrogatories	0.60 175.00/hr	105.00
	PGL Review draft motion and conference with Mr. Vitt regarding same	0.30 200.00/hr	60.00
	JK Review emails from G. Vitt and K.B. Kramer w/ documents from latest production - tenth.	0.40 100.00/hr	40.00
	JK Email w/from K. B. Kramer about visit, meeting and QA production	0.20 100.00/hr	20.00
	GJV Review issues w/ D-H production and draft supplemental interrogatory to D-H; email K. Kramer re: proposed discovery	0.60 320.00/hr	192.00
	GJV E-mail M. B. Porter and emails with K. Kramer and revise interrogatory	0.30 320.00/hr	96.00
	GJV Review draft motion and edit; conf. P. Lilienthal	0.30 320.00/hr	96.00
	GJV Several email and edit motion	0.30 320.00/hr	96.00
	GJV Review emails with D. Schroeder and J. Joseph; email D. Schroeder and review responses to requests and interrogatories	0.30 320.00/hr	96.00
	For professional services rendered	106.50	\$16,116.00
	Previous balance		\$25,755.45
3/12/2019	Payment - thank you. Check No. 5308		(\$1,521.00)
	Total payments and adjustments		(\$1,521.00)
	Balance due		\$40,350.45

Misty Porter

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## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	15.20	320.00	\$4,864.00
Julia Korkus	56.00	100.00	\$5,600.00
Katherine B. Kramer	30.40	175.00	\$5,320.00
Phillipa G. Lilienthal	0.50	200.00	\$100.00
Sarah Nunan	2.90	80.00	\$232.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

May 14, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13506

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
4/2/2019	KBK Exchange emails with Geoffrey Vitt regarding next steps; telephone conference with Geoffrey Vitt regarding next steps; revise and finalize motion for attorney's fees based on motion to compel interrogatory response; email to Don Schroeder and Jessica Joseph regarding discovery disputes; email to Geoffrey Vitt regarding discovery; receive and review order from court regarding attorney-client privileged documents	1.40 175.00/hr	245.00
	GJV Review supplemental requests re: QA	0.20 320.00/hr	64.00
	GJV Review emails re: interrogatory answers and email K. Kramer	0.20 320.00/hr	64.00
	JK Receive and review email from G. Vitt on QA documents; review QA document production and privilege log; risk management.	1.50 100.00/hr	150.00
	GJV Telephone conference with K. Kramer re: next steps	0.10 320.00/hr	32.00
4/3/2019	SN Reviewing emails	0.20 80.00/hr	16.00
	KBK Exchange emails with Geoffrey Vitt regarding discovery; exchange emails with Don Schroeder regarding discovery meet-and-confer	0.30 175.00/hr	52.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/3/2019	GJV E-mails with K. Kramer and review D. Schroeder letter	0.20 320.00/hr	64.00
4/4/2019	SN Reviewed QA docs and privilege log	0.40 80.00/hr	32.00
	SN Meeting with GJV, KBK, JK RE plan for deposition prep and document review	2.00 80.00/hr	160.00
	SN Preparing document for Misty Deposition and email to JK, GJV & KBK	0.50 80.00/hr	40.00
	KBK Meeting with Geoffrey Vitt; prepare for telephone conference with Don Schroeder and Jessica Joseph	0.30 175.00/hr	52.50
	KBK Review drafts of additional discovery requests; email to Geoffrey Vitt regarding interrogatories; telephone conference with Don Schroeder and Jessica Joseph	1.10 175.00/hr	192.50
	KBK Strategy meeting with Geoffrey Vitt, Sarah Nunan and Julia Korkus regarding discovery	2.10 175.00/hr	367.50
	GJV Conference K. Kramer and conf. S. Nunan	0.20 320.00/hr	64.00
	GJV T/c D. Schroeder and K. Kramer	0.90 320.00/hr	288.00
	GJV Review documents produced recently by D-H	2.30 320.00/hr	736.00
	JK Conf. w/ K.B. Kramer, G Vitt, S. Nunan re: discovery planning	2.10 100.00/hr	210.00
	JK Deposition preparation, document review of skills & standard topics; review deposition outline and previously marked set of key documents	3.50 100.00/hr	350.00
	JK Conf. and emails w/ S. Nunan re: privilege logs and defendants production.	0.20 100.00/hr	20.00
4/5/2019	KBK Receive and review served third set of interrogatories and requests to produce to Dartmouth-Hitchcock; email to Don Schroeder regarding scheduling order; email to Geoffrey Vitt regarding depositions; exchange emails with Misty Porter regarding deposition	0.50 175.00/hr	87.50
	GJV Review Misty's deposition outline	0.10 320.00/hr	32.00
	JK Emails w/ J. Joseph re: tenth production files.	0.20 100.00/hr	20.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/5/2019	JK	Review tenth production native files and reproduction.	2.60 100.00/hr	260.00
	JK	Receive and review third set of interrogatories and requests for documents to defendants.	0.30 100.00/hr	30.00
	JK	Prepare updated native file searchable log and update log of production.	2.40 100.00/hr	240.00
4/6/2019	SN	Reviewing QA docs	1.80 80.00/hr	144.00
4/7/2019	SN	Reviewing QA docs	1.10 80.00/hr	88.00
	SN	Reviewed KBK's claim charts and made notes; QA Document review	1.00 80.00/hr	80.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition schedules	0.10 175.00/hr	17.50
	KBK	Draft claim chart	1.30 175.00/hr	227.50
	GJV	Review K. Kramer email and chart and email K. Kramer	0.20 320.00/hr	64.00
4/8/2019	GJV	Outline for meeting with witnesses	0.30 320.00/hr	96.00
	SN	Porter reviewing QA documents; conf. with GJV RE QA docs	1.40 80.00/hr	112.00
	KBK	Exchange emails with Jessica Joseph regarding amendment to scheduling order	0.20 175.00/hr	35.00
	GJV	E-mails	0.20 320.00/hr	64.00
	GJV	Review QA documents and review with S. Nunan the Privilege Log and determine documents not produced	0.50 320.00/hr	160.00
	JK	Review claim chart from K.B. Kramer and document deposition preparation	3.50 100.00/hr	350.00
	JK	Revise native file searchable log and log of production.	1.30 100.00/hr	130.00
4/9/2019	SN	Drafting letter to Schroeder based on QA analysis	0.50 80.00/hr	40.00



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/9/2019	SN	Reviewed facts with GJV and revised letter; reviewed production documents and communications with JK; conf with GJV on more revisions; sent letter to Schroeder	1.30 80.00/hr	104.00
	KBK	Receive and review letter from Geoffrey Vitt to Don Schroeder regarding quality assurance documents and privilege log	0.10 175.00/hr	17.50
	JK	Review native files and master log of first through tenth production; focus on from and to for key witnesses and deposition preparation.	4.20 100.00/hr	420.00
4/11/2019	SN	Reviewing discovery spreadsheet from JK	0.60 80.00/hr	48.00
	GJV	E-mail S. Nunan and K. Kramer re: QA docs.	0.10 320.00/hr	32.00
	JK	Prepare summary of production log and conf. and email w/ SHN	1.60 100.00/hr	160.00
4/12/2019	SN	Reviewing QA documents	2.00 80.00/hr	160.00
	SN	Conf with GJV on depositions, outlines, and documents	0.30 80.00/hr	24.00
	SN	Reviewing QA documents	0.30 80.00/hr	24.00
	SN	Conf with GJV on QA documents and discussion about the value institute involvement	0.30 80.00/hr	24.00
	GJV	E-mail D. Schroeder and J. Joseph	0.10 320.00/hr	32.00
	GJV	Conference S. Nunan and review documents to begin preparation for M. B. Porter depo preparation	1.20 320.00/hr	384.00
	JK	Prepare documents for deposition preparation re: deposition outline.	2.60 100.00/hr	260.00
4/13/2019	GJV	Memo on deposition preparation, subpoenas, depo of D-H representatives and DH issues re QA docs.	1.00 320.00/hr	320.00
	JK	Receive and review email from G. Vitt on discovery and depositions.	0.20 100.00/hr	20.00
4/15/2019	KBK	Receive and review emails from Geoffrey Vitt and Jessica Joseph regarding document production	0.10 175.00/hr	17.50



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/16/2019	KBK	Prepare and circulate motion to amend scheduling order	0.40 175.00/hr	70.00
	KBK	Exchange emails with Liz Bower and Geoffrey Vitt regarding deposition prep dates	0.20 175.00/hr	35.00
	KBK	Receive and review DHMC's response to motion for attorney's fees	0.50 175.00/hr	87.50
4/17/2019	KBK	Exchange emails with Liz Bower regarding reply brief deadline; receive and review revised privilege log; receive and review supplemental interrogatory answer by Dartmouth-Hitchcock Clinic regarding federal funding	0.20 175.00/hr	35.00
	JK	Prepare documents for deposition preparation re: deposition outline.	2.40 100.00/hr	240.00
4/18/2019	SN	Conf with JK RE new production log and ninth production of documents	0.20 80.00/hr	16.00
	SN	Review KBK's email, conf with JK and respond to email	0.20 80.00/hr	16.00
	KBK	Receive and review revised discovery schedule stipulation from Jessica Joseph; forward to Liz Bower for filing; receive and review filed joint motion to amend discovery schedule; exchange emails with Geoffrey Vitt regarding discovery issues	0.50 175.00/hr	87.50
	JK	Review and compare revised privilege log from defendants; prepare set of risk management documents for deposition preparation; run searches on native log re: outline.	2.80 100.00/hr	280.00
4/19/2019	SN	Prepare documents for GJV	0.20 80.00/hr	16.00
	SN	Reviewing email from JK and from client; compared new log to old to determine all QA documents produced	1.10 80.00/hr	88.00
	KBK	Prepare for telephone conference with Geoffrey Vitt; telephone conference with Geoffrey Vitt regarding discovery; email to Don Schroeder and Jessica Joseph regarding depositions; exchange emails with Misty Porter regarding Dr. Bernstein; receive and review court order granting motion to amend discovery schedule	0.90 175.00/hr	157.50
	KBK	Review selection of document production from Julia Korkus	0.40 175.00/hr	70.00
	GJV	Work on outline for deposition preparation	0.90 320.00/hr	288.00
	GJV	Outline for DeMars deposition	0.80 320.00/hr	256.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/19/2019	JK	Receive and review file memo from G. Vitt re: records and claims.	0.30 100.00/hr	30.00
	JK	Reviewing ninth production per deposition preparation.	3.20 100.00/hr	320.00
	GJV	T/c K. Kramer re. discovery	0.20 320.00/hr	64.00
4/20/2019	SN	Review GJV memo and conf with GJV RE substance of memo and preparing Misty Porter, work on documents	0.30 80.00/hr	24.00
4/23/2019	KBK	Receive and review memorandum from Geoffrey Vitt regarding deposition preparation	0.10 175.00/hr	17.50
4/24/2019	KBK	Exchange emails with Liz Bower regarding ENE	0.10 175.00/hr	17.50
	GJV	E-mails with J. Joseph	0.20 320.00/hr	64.00
4/25/2019	KBK	Telephone conference with Geoffrey Vitt regarding discovery; receive and review discovery letter from Don Schroeder regarding subpoena of David Seifer; review documents produced from David Seifer	0.80 175.00/hr	140.00
	GJV	Review J. Joseph email	0.20 320.00/hr	64.00
	GJV	E-mails and Seifer production	0.20 320.00/hr	64.00
	JK	Review Seifer documents received from defendants and email to team.	2.30 100.00/hr	230.00
	JK	Reviewing ninth production per deposition preparation and outline	3.20 100.00/hr	320.00
4/26/2019	SN	Conf with GJV RE prep; review JK's email suggestions for starting; email outline to GJV	0.30 80.00/hr	24.00
	KBK	Receive and review deposition notice for Joanne Conroy; telephone conference with Julia Korkus regarding deposition preparation for Misty Porter and other discovery issues; prepare for Misty Porter deposition preparation sessions	1.20 175.00/hr	210.00
	KBK	Draft reply brief in support of motion for attorney's fees	1.50 175.00/hr	262.50
	GJV	E-mail and conf. J. Korkus	0.20 320.00/hr	64.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2019	GJV	Review documents for deposition prep session with M. Porter	1.80 320.00/hr	576.00
	JK	Phone call w/ K.B. Kramer re: deposition & discovery planning.	0.70 100.00/hr	70.00
	JK	Prepare documents for G. Vitt review re: deposition preparation meeting with M. Blanchette Porter	3.50 100.00/hr	350.00
4/27/2019	KBK	Telephone call with Geoffrey Vitt regarding deposition preparation	0.50 175.00/hr	87.50
	KBK	Draft reply in support of motion for attorney's fees; email draft brief to Geoffrey Vitt	1.40 175.00/hr	245.00
	KBK	Prepare for deposition preparation session with Misty Porter	0.30 175.00/hr	52.50
	GJV	T/c K. Kramer	0.50 320.00/hr	160.00
4/28/2019	SN	Review KBK memos with GJV and discuss	0.20 80.00/hr	16.00
	SN	Conf. With GJV RE themes and sent KBK outline	0.20 80.00/hr	16.00
	KBK	Prepare for Misty Porter's deposition preparation session	2.20 175.00/hr	385.00
	KBK	Exchange emails with Geoffrey Vitt regarding case strategy and legal issues	0.50 175.00/hr	87.50
	JK	Receive and review emails and revised theme of case from K.B. Kramer	0.40 100.00/hr	40.00
	GJV	Conf. with S. Nunan re: themes for case	0.20 320.00/hr	64.00
	GJV	Exchange e-mails with K. Kramer re. case strategy and legal issues	0.50 320.00/hr	160.00
4/29/2019	SN	Meeting with GJV, KBK, JK RE discovery and depositions	1.10 80.00/hr	88.00
	KBK	Travel to Norwich for deposition preparation meeting with Misty Porter	1.50 175.00/hr	262.50
	KBK	Meeting with Misty Porter, Geoffrey Vitt and Julia Korkus for deposition preparation	3.50 175.00/hr	612.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/29/2019	KBK Finalize brief and email reply brief on attorney's fees to Liz Bower for filing; email to Jessica Joseph regarding Ed Merrens deposition	0.20 175.00/hr	35.00
	KBK Team meeting regarding discovery planning	1.10 175.00/hr	192.50
	KBK Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	GJV Prepare for and attend prep session for M. Porter deposition	2.20 320.00/hr	704.00
	GJV Conference with K. Kramer, S. Nunan and J. Korkus re: Preparation and assembly of for depositions	1.10 320.00/hr	352.00
	GJV Review outline and notes of meeting	0.60 320.00/hr	192.00
	JK Deposition preparation meeting w/ M. Blanchette Porter, K.B. Kramer, and G. Vitt.	3.50 100.00/hr	350.00
	JK Discovery planning meeting w/ G. Vitt, K.B. Kramer & S. Nunan	1.10 100.00/hr	110.00
4/30/2019	KBK Receive and review emails from Geoffrey Vitt and Misty Porter regarding discovery issues; receive and review email from Jessica Joseph confirming deposition date for Ed Merrens; receive and review Ed Merrens deposition notice and emails exchanged by Jessica Joseph and Geoffrey Vitt regarding subpoena to Albert Hsu	0.50 175.00/hr	87.50
	JK Review discovery document per deposition preparation; exchange emails w/ G. Vitt on same.	5.10 100.00/hr	510.00
	GJV File memorandum of meeting and outline for deposition of Leslie Demars	1.20 320.00/hr	384.00
	GJV Review documents in connection with preparation of Dr. Porter for deposition	0.90 320.00/hr	288.00
	For professional services rendered	119.20	\$17,660.00
	Previous balance		\$40,350.45
4/16/2019	Payment - thank you. Check No. 5320		(\$14,116.00)
	Total payments and adjustments		(\$14,116.00)
	Balance due		\$43,894.45

Misty Porter

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## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	19.50	320.00	\$6,240.00
Julia Korkus	54.70	100.00	\$5,470.00
Katherine B. Kramer	26.00	175.00	\$4,550.00
Sarah Nunan	17.50	80.00	\$1,400.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

June 14, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13558

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2019	GJV Several e-mails	0.20 320.00/hr	64.00
	GJV Prepare draft of motion re: deposition of J. Conroy	0.40 320.00/hr	128.00
	KBK Exchange emails with Geoffrey Vitt regarding depositions	0.10 175.00/hr	17.50
	JK Email from G. Vitt; Research requests and interrogatories	1.20 100.00/hr	120.00
	JK Document review re: deposition preparation of M.B. Porter and topics for DeMars deposition	4.00 100.00/hr	400.00
	JK Revise ongoing matter names list	0.30 100.00/hr	30.00
5/2/2019	KBK Receive and review response to request to produce from Albert Hsu; exchange emails with Geoffrey Vitt and Misty Porter regarding deposition of Misty Porter; review production of documents from David Seifer; receive and review court order on motion to compel attorney-client privileged documents; exchange email with Geoffrey Vitt regarding discovery	1.60 175.00/hr	280.00
	JK Receive and review court order on motion to compel; review privilege logs and privileged docs.	1.70 100.00/hr	170.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/2/2019	JK Email to G. Vitt and K. B. Kramer re: M.B. Porter deposition prep and skills	0.20 100.00/hr	20.00
5/3/2019	SN Conf with JK RE document searches and review	0.40 80.00/hr	32.00
	KBK Exchange emails with Geoffrey Vitt and Misty Porter regarding deposition planning and other issues; call Jessica Joseph and leave a message; email to Don Schroeder regarding attorney-client document production; review email from Misty Porter; exchange emails with Jessica Joseph regarding deposition scheduling; exchange emails with Geoffrey Vitt regarding depositions	0.60 175.00/hr	105.00
	JK Research and prepare documents, Division team meetings, D-H response and J. Conroy for G. Vitt and K.B. Kramer and listen to Conroy's October 2017 recorded interview from D-H; emails w/ M.B. Porter and K.B. Kramer.	4.80 100.00/hr	480.00
	JK Revisions to M.B. Porter timeline	0.50 100.00/hr	50.00
5/4/2019	GJV Motion to compel re: Dr. Conroy deposition	1.30 320.00/hr	416.00
5/5/2019	GJV Motion re: Dr. Conroy	0.80 320.00/hr	256.00
5/6/2019	GJV E-mail K. Kramer re: depositions, A/C privilege, Risk Management and motion	0.30 320.00/hr	96.00
	GJV Review and revise motion; t/c K. Kramer re: depositions, motion and M. Porter depo prep	0.50 320.00/hr	160.00
	GJV Revise memorandum and revise motion	0.70 320.00/hr	224.00
	GJV Revise memorandum re: M. Porter meeting and work on deposition prep	0.50 320.00/hr	160.00
	KBK Exchange emails with Misty Porter regarding scheduling; exchange emails with Geoffrey Vitt regarding next steps; call Geoffrey Vitt and leave a voicemail message; email to Jessica Joseph and Don Schroeder regarding subpoena of Dr. Hsu; telephone conference with Geoffrey Vitt regarding discovery issues	1.20 175.00/hr	210.00
	KBK Review selected documents from Julia Korkus; prepare file memorandum regarding April 29 meeting	1.80 175.00/hr	315.00
	JK Deposition preparation - key word search of documents per witness, dates; emails w/ G. Vitt, K.B. Kramer, S. Nunan, and M.B. Porter w/ link to document set; review memo updates from K.B. Kramer	5.00 100.00/hr	500.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/6/2019	JK Phone call w/ K.B. Kramer and email to M. Blanchette Porter re: discovery emails.	0.20 100.00/hr	20.00
5/7/2019	GJV Work on memorandum of M. Porter meeting and evidence issues; depo prep	1.00 320.00/hr	320.00
	KBK Review emails from Misty Porter and Geoffrey Vitt regarding discovery; receive and review DHMC's response to third set of interrogatories and requests to produce; telephone conference with Julia Korkus regarding deposition preparation for Misty Porter; exchange emails with Geoffrey Vitt; leave message for Jessica Joseph regarding deposition of Misty Porter	1.50 175.00/hr	262.50
	KBK Telephone conference with Jessica Joseph regarding deposition dates and other issues; email to Jessica Joseph regarding meet-and-confer; exchange emails with Julia Korkus; receive and review emails from Geoffrey Vitt and Misty Porter	0.50 175.00/hr	87.50
	JK Prepare and telephone conf. w/ K.B. Kramer re: deposition prep of M. B. Porter	0.70 100.00/hr	70.00
5/8/2019	GJV Review email re: depositions	0.10 320.00/hr	32.00
	GJV Emails re: depositions and discovery	0.20 320.00/hr	64.00
	KBK Research legal issues regarding claims and prepare internal memorandum	0.90 175.00/hr	157.50
	KBK Telephone conference with Darlene Sweeney regarding meeting with Dr. Ira Bernstein; review video interview of Joanne Conroy; exchange emails with Misty Porter	0.40 175.00/hr	70.00
	JK Deposition preparation - focus on whistleblower, standards, and team dynamics.	3.70 100.00/hr	370.00
5/9/2019	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV Telephone conference with D. Schroeder, K. Kramer, and J Joseph; t/c K. Kramer	1.00 320.00/hr	320.00
	GJV T/c K. Kramer re. Hsu subpoena	0.20 320.00/hr	64.00
	SN Downloading Hsu Documents to Sharefile for attorney access	1.10 80.00/hr	88.00
	KBK Receive and review discovery responses from DHMC; receive and begin reviewing Albert Hsu's document production in response to plaintiff's subpoena; telephone conference with Geoffrey Vitt	0.70 175.00/hr	122.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2019	KBK Prepare for meet and confer telephone conference with Jessica Joseph and Don Schroeder; meet and confer with Jessica Joseph and Don Schroeder; telephone conferences with Geoffrey Vitt; email Misty Porter with update	1.70 175.00/hr	297.50
5/10/2019	KBK Review production of documents from Hsu subpoena; review litigation hold letter; receive and review letter from Don Schroeder regarding attorney-client documents	0.20 175.00/hr	35.00
5/11/2019	JK Receive and review email summary from M. B. Porter	0.10 100.00/hr	10.00
5/13/2019	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV T/c K. Kramer, D. Schroeder and J. Joseph	0.20 320.00/hr	64.00
	GJV Review draft Conroy motion, t/c K. Kramer and email K. Kramer	0.20 320.00/hr	64.00
	KBK Telephone conference with Geoffrey Vitt regarding meet-and-confer; meet-and-confer telephone conference with Don Schroeder and Jessica Joseph regarding depositions	0.30 175.00/hr	52.50
	KBK Exchange emails with Misty Porter regarding depositions and discovery; review Hsu production; email to Don Schroeder and Jessica Joseph regarding depositions	0.50 175.00/hr	87.50
5/14/2019	GJV Review A/C documents produced by D-H	0.60 320.00/hr	192.00
	GJV T/c K. Kramer and draft email to D. Schroeder	0.60 320.00/hr	192.00
	GJV E-mails with K. Kramer and revise D. Schroeder email	0.50 320.00/hr	160.00
	GJV Review documents recently produced by D-H	0.80 320.00/hr	256.00
	GJV Deposition prep	0.20 320.00/hr	64.00
	KBK Receive and review production of documents previously withheld as attorney-client privileged; telephone conference with Geoffrey Vitt regarding attorney-client production; exchange emails with Julia Korkus regarding same	0.80 175.00/hr	140.00
	KBK Exchange emails with Geoffrey Vitt regarding "attorney's eyes only" designation of document by DHMC; review additional production of attorney-client privileged documents from DHMC	0.50 175.00/hr	87.50

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/14/2019	KBK Receive and review revised memorandum from Misty Porter regarding attorney-client meeting	1.00 175.00/hr	175.00
	KBK Telephone conference with Geoffrey Vitt regarding DH's motion for protective order on Conroy's deposition	0.10 175.00/hr	17.50
	KBK Receive and review DH's motion for protective order on Conroy's deposition	0.70 175.00/hr	122.50
	JK Review Prod 11 new and reproduced D-H attorney-client privileged document sets produced per court order; email and summary to G. Vitt and K. B. Kramer; order on motion/privilege log comparison	3.70 100.00/hr	370.00
	JK Review email from D. Schroeder to Court re: motion to compel documents	0.10 100.00/hr	10.00
	JK Review M. B. Porter notes on memo of April 29, 2017 meeting	0.30 100.00/hr	30.00
	JK Revise production logs and matter timeline	0.60 100.00/hr	60.00
5/15/2019	GJV E-mail	0.10 320.00/hr	32.00
	GJV E-mail	0.10 320.00/hr	32.00
	GJV Prepare for depositions	0.30 320.00/hr	96.00
	GJV Review emails re. A/C privilege and review documents from D-H	0.20 320.00/hr	64.00
	GJV Prepare for depositions	0.30 320.00/hr	96.00
	GJV Review emails re. A/C privilege and review documents from D-H	0.20 320.00/hr	64.00
	KBK Email to Don Schroeder and Jessica Joseph regarding meet-and-confer on confidentiality designation	0.10 175.00/hr	17.50
	KBK Exchange emails with Liz Bower, Julia Korkus and Geoffrey Vitt regarding response to DHMC's motion for protective order regarding Joanne Conroy's deposition	0.20 175.00/hr	35.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery issues	0.10 175.00/hr	17.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/15/2019	JK	Review privilege log; emails to J. Joseph re: motion to compel list vs. privilege log list; prepare new version of D-H privilege log to document changes.	1.20 100.00/hr	120.00
	JK	Email w/ K. B. Kramer and G. Vitt and prepare re: Joanne Conroy and reason for closure documents	0.80 100.00/hr	80.00
	JK	Review new HSU documents	3.60 100.00/hr	360.00
5/16/2019	GJV	Review DH answers re: Risk Management and prepare letter to Schroeder	0.30 320.00/hr	96.00
	GJV	Prepare 30(b)(6) notice re AC privilege and Risk Management	0.50 320.00/hr	160.00
	KBK	Exchange emails with Jessica Joseph regarding confidentiality designation; exchange emails with Geoffrey Vitt regarding 30(b)(6) depositions; exchange emails with Julia Korkus regarding Misty Porter	0.20 175.00/hr	35.00
	KBK	Email to Jessica Joseph and Don Schroeder regarding Hsu subpoena response	0.20 175.00/hr	35.00
	KBK	Draft response to DHMC's motion for protective order regarding deposition of Joanne Conroy	1.80 175.00/hr	315.00
	JK	Review new production from D-H re: subpoena to Albert Hsu	5.20 100.00/hr	520.00
5/17/2019	KBK	Receive and review Production 12 from DHMC in response to Plaintiff's Third Requests for Documents; email to Misty Porter with additional document from production	0.10 175.00/hr	17.50
	KBK	Exchange emails with Misty Porter regarding additional document from production	0.40 175.00/hr	70.00
	KBK	Receive and review Production 12 from DHMC in response to Plaintiff's Third Requests for Documents; email to Geoffrey Vitt and Julia Korkus regarding review	1.60 175.00/hr	280.00
	KBK	Receive and review order denying motion for attorney's fees; email to Geoffrey Vitt regarding order; forward order to Misty Porter	0.30 175.00/hr	52.50
	KBK	Exchange emails with Misty Porter regarding order denying motion for attorney's fees	0.20 175.00/hr	35.00
	JK	Review Prod 12 from D-H re: risk management issues and Plaintiff's Third Requests for production of documents from D-H	1.70 100.00/hr	170.00
	JK	Review new production from D-H re: subpoena to Albert Hsu	4.00 100.00/hr	400.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
5/18/2019	JK	Receive and review email from M.B.Porter w/ link to D-H and Catholic Medical merger.	0.10 100.00/hr	10.00
5/19/2019	GJV	Review rule 30(b)(6) notice and email re: Risk Management	0.60 320.00/hr	192.00
	KBK	Draft response to motion for protective order regarding deposition of Joanne Conroy	0.40 175.00/hr	70.00
	JK	Receive and review K.B. Kramer draft of Plaintiff's response to motion for protective order	0.20 100.00/hr	20.00
5/20/2019	GJV	Review interrogatory answer re: adequacy	0.20 320.00/hr	64.00
	KBK	Receive and review article from Misty Porter regarding DHMC merger with Catholic Medical Center; email to Misty Porter regarding same	0.10 175.00/hr	17.50
	JK	Review new production from D-H re: subpoena to Albert Hsu	3.50 100.00/hr	350.00
	JK	Review D-H prod - physician chart reports and related correspondence from E. Merrens	1.40 100.00/hr	140.00
5/21/2019	GJV	Review draft motion	0.20 320.00/hr	64.00
	GJV	Review all documents that DH produced that had been withheld on A/C privilege basis and prepare memorandum; prepare draft motion	2.10 320.00/hr	672.00
	JK	Review ninth production from D-H re: deposition preparation	3.60 100.00/hr	360.00
5/22/2019	SN	Reviewed AC documents	1.10 80.00/hr	88.00
	SN	Reviewed memo to file from GJV, KBK and MBP; followed up with questions to GJV and JK; sent email to KBK	1.60 80.00/hr	128.00
	GJV	Finalize Rule 30(b)(6) Notice and email K. Kramer re: Risk Management	0.60 320.00/hr	192.00
	GJV	E-mail K. Kramer re: deposition and motion re: Conroy	0.20 320.00/hr	64.00
	GJV	Revise Rule (30)(6) notice	0.30 320.00/hr	96.00
	GJV	Prepare for M. Porter deposition	0.50 320.00/hr	160.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/22/2019	GJV	Witnesses on disability	0.20 320.00/hr	64.00
	GJV	Review all documents that DH withheld on A/C privilege grounds and prepare draft motion for sanctions	2.10 320.00/hr	672.00
	JK	Extension on Reply to D-H motion re: Conroy deposition	0.30 100.00/hr	30.00
	JK	Conf. w/ S. Nunan on witness interview planning	0.10 100.00/hr	10.00
	JK	Prepare memo on witnesses and D. Schroeder representation	0.70 100.00/hr	70.00
	JK	Review document production re: deposition preparation - REI closure reasons	2.70 100.00/hr	270.00
5/23/2019	KBK	Exchange emails with Geoffrey Vitt and Sarah Nunan regarding next steps; receive and review emails from Don Schroeder regarding discovery issues	0.20 175.00/hr	35.00
	GJV	Prepare for deposition	0.30 320.00/hr	96.00
	PGL	Meet with Mr. Vitt regarding motion to compel	0.70 200.00/hr	140.00
	JK	Prepare summary and document set for G. Vitt on documents originally withheld and redacted re: questions about privilege claim	1.50 100.00/hr	150.00
	JK	Review new production from D-H re: subpoena to Albert Hsu	2.70 100.00/hr	270.00
	JK	Review documents per deposition outline and preparation; update disability timeline.	1.70 100.00/hr	170.00
5/24/2019	GJV	Review redacted documents	0.30 320.00/hr	96.00
	GJV	Prepare for M. Porter deposition	1.10 320.00/hr	352.00
	JK	Deposition preparation re: documents related to deposition of E. Merrens	2.40 100.00/hr	240.00
5/25/2019	GJV	Review memorandum; prepare questions for L. DeMars	1.50 320.00/hr	480.00
5/28/2019	GJV	Review possible depo subjects and prepare for DeMars and Porter depositions	2.70 320.00/hr	864.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/28/2019	JK Emails w/ J. Joseph re: Porter Discovery document issue - #39 and #68 under court order.	0.20 100.00/hr	20.00
	JK Review Prod 9, 10 and 11 per deposition preparation.	4.50 100.00/hr	450.00
5/29/2019	JK Review Hsu, DeMars, Seifer documents per deposition preparation	3.40 100.00/hr	340.00
5/30/2019	JK Review Production 9 and 12 per deposition preparation.	3.50 100.00/hr	350.00
5/31/2019	KBK Exchange emails with Misty Porter regarding discovery	0.10 175.00/hr	17.50
	KBK Draft and revise response to motion regarding deposition of Joanne Conroy	0.90 175.00/hr	157.50
	JK Review Prod 9 for deposition preparation	2.10 100.00/hr	210.00
	For professional services rendered	130.70	\$20,338.00
	Previous balance		\$43,894.45
5/20/2019	Payment - thank you		(\$14,500.00)
	Total payments and adjustments		(\$14,500.00)
	Balance due		\$49,732.45

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	25.60	320.00	\$8,192.00
Julia Korkus	78.20	100.00	\$7,820.00
Katherine B. Kramer	22.00	175.00	\$3,850.00
Phillipa G. Lilienthal	0.70	200.00	\$140.00
Sarah Nunan	4.20	80.00	\$336.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

July 08, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13655

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2019	GJV	Review and edit motion re: Conroy	0.40 320.00/hr	128.00
	KBK	Revise response to motion for protective order regarding Joanne Conroy deposition; email brief to Geoffrey Vitt	0.70 175.00/hr	122.50
	JK	Emails w/ J. Joseph re: Discovery documents and privilege log per court order	0.10 100.00/hr	10.00
6/3/2019	GJV	Outline for conversation with Schroeder re: depositions and discovery	0.20 320.00/hr	64.00
	GJV	T/c K. Kramer; email M. Porter and K. Kramer	0.30 320.00/hr	96.00
	GJV	Conference with S. Nunan and J. Korkus re: documents needed for jury selection and presentation	0.40 320.00/hr	128.00
	GJV	Prepare for M. Porter deposition	0.40 320.00/hr	128.00
	KBK	Prepare for telephone conference with Geoffrey Vitt regarding outstanding discovery issues; telephone conference with Geoffrey Vitt	0.40 175.00/hr	70.00
	JK	Merrens deposition preparation - review production from D-H	2.70 100.00/hr	270.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/3/2019	JK Prepare for M. Blanchette Porter deposition	2.10 100.00/hr	210.00
	GJV Conversation with K. Kramer re. outstanding discovery	0.20 320.00/hr	64.00
6/4/2019	GJV Review emails with J. Joseph re: Hsu subpoena	0.30 320.00/hr	96.00
	GJV E-mails with K. Kramer re: depositions and review J. Joseph email	0.20 320.00/hr	64.00
	GJV E-mails with J. Joseph and D. Schroeder re: interrogatory answers	0.20 320.00/hr	64.00
	GJV Review disability documents and prepare for deposition	0.80 320.00/hr	256.00
	GJV Prepare for M. Porter deposition	1.50 320.00/hr	480.00
	KBK Exchange emails with Geoffrey Vitt regarding depositions	0.10 175.00/hr	17.50
	KBK Receive and review court order regarding privileged documents	0.10 175.00/hr	17.50
	KBK Exchange emails with Geoffrey Vitt regarding discovery	0.30 175.00/hr	52.50
	JK Receive and review additional court order on motion to compel	0.20 100.00/hr	20.00
6/5/2019	KBK Exchange emails with Misty Porter and Geoffrey Vitt regarding deposition preparation; prepare for Misty Porter deposition	0.30 175.00/hr	52.50
	KBK Review draft letter to Don Schroeder regarding subpoena response from Albert Hsu and exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK Email assistant for Dr. Bernstein regarding meeting; telephone conference with Dr. Bernstein's office regarding meeting; email to Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK Review and revise draft Rule 30(b)(6) deposition notice regarding risk management; email revised 30(b)(6) deposition notice to Geoffrey Vitt	0.90 175.00/hr	157.50
	KBK Draft letter to Don Schroeder regarding litigation hold letter violation due to Albert Hsu's deletion of text messages	0.60 175.00/hr	105.00
	KBK Exchange emails with Geoffrey Vitt regarding privileged documents	0.30 175.00/hr	52.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/5/2019	KBK Prepare interview questions for informal interviews with other witnesses	0.20 175.00/hr	35.00
	JK Emails w/ K.B. Kramer re: A/C documents and privilege log request and issues with Defense Counsel.	0.20 100.00/hr	20.00
	JK Exchange emails w/ G. Vitt re: disability/work accommodations timeline and chart; review disability records email to M. Blanchette Porter	2.40 100.00/hr	240.00
	JK Review DH production of Porter's medical records	1.30 100.00/hr	130.00
	JK Review and receive email on Hsu documents	0.10 100.00/hr	10.00
	JK Review Porter interrogatory responses and documents produced re: preparation for M. Blanchette Porter deposition	2.70 100.00/hr	270.00
	GJV Outline for Herrick deposition	2.50 320.00/hr	800.00
	GJV E-mail exchanges with K. Kramer re: privilege documents	0.30 320.00/hr	96.00
6/6/2019	KBK Receive and review correspondence between Geoffrey Vitt and Don Schroeder regarding discovery responses; email to Don Schroeder and Jessica Joseph regarding privilege log	0.40 175.00/hr	70.00
	KBK Call to potential witnesses and leave voicemail messages requesting return call; prepare for informal interviews with potential witnesses	0.30 175.00/hr	52.50
	KBK Telephone conference with Julia Korkus regarding deposition preparation for Misty Porter	0.50 175.00/hr	87.50
	KBK Exchange emails with Geoffrey Vitt regarding discovery	0.10 175.00/hr	17.50
	KBK Telephone conference with Dr. Bernstein's office regarding meeting	0.10 175.00/hr	17.50
	KBK Prepare for M. Porter deposition	0.60 175.00/hr	105.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00
	KBK Receive and review correspondence from Geoffrey Vitt to Don Schroeder regarding 30(b)(6) deposition notice	0.10 175.00/hr	17.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2019	KBK	Review documents for Misty Porter deposition preparation; email to Geoffrey Vitt regarding depositions	0.30 175.00/hr	52.50
	KBK	Travel to Norwich for deposition preparation meeting with Misty Porter	1.50 175.00/hr	NO CHARGE
	JK	Prepare and telephone conference w/ K.B. Kramer re: deposition preparation for M. Blanchette Porter.	0.70 100.00/hr	70.00
	JK	Email summary to G. Vitt re: discussion topics for M. Blanchette Porter deposition preparation.	0.30 100.00/hr	30.00
	JK	Prepare for M. Blanchette Porter deposition	2.40 100.00/hr	240.00
	JK	Prepare copy of Porter texts w/ DeMars for G. Vitt review	0.80 100.00/hr	80.00
	GJV	Work on outline for preparation of M. Porter for deposition	2.10 320.00/hr	672.00
	GJV	T/c K. Kramer re: deposition prep	0.20 320.00/hr	64.00
6/7/2019	KBK	Prepare for meeting with Misty Porter for deposition preparation; meeting with Misty Porter, Geoffrey Vitt and Julia Korkus to prepare for Misty Porter's deposition	3.40 175.00/hr	595.00
	KBK	Review documents and other discovery responses to prepare for Misty Porter deposition	0.50 175.00/hr	87.50
	KBK	Return travel from Norwich	1.50 175.00/hr	262.50
	JK	Prepare for and meet w/ M. Blanchette Porter, G. Vitt, K.B. Kramer re: MBP deposition preparation	5.10 100.00/hr	510.00
	JK	Receive and review filing from G. Vitt re: Plaintiff's Rule 30(b)(6) Notice of Deposition	0.10 100.00/hr	10.00
	GJV	Prepare M. Porter for deposition	4.20 320.00/hr	1,344.00
6/8/2019	GJV	Memorandum re: 6/7 meeting and deposition issues	2.10 320.00/hr	672.00
	GJV	DeMars outline	0.70 320.00/hr	224.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2019	GJV	Additional discovery to DH	0.30 320.00/hr	96.00
	GJV	Trial issues memo	0.30 320.00/hr	96.00
	GJV	Outstanding discovery owed by DH	0.20 320.00/hr	64.00
6/9/2019	KBK	Travel to Norwich for deposition preparation meeting and deposition of Misty Porter	1.50 175.00/hr	262.50
	GJV	Review text messages and prepare for M. Porter deposition	3.50 320.00/hr	1,120.00
6/10/2019	GJV	Review documents produced in discovery by DH and prepare Misty Porter for deposition	6.00 320.00/hr	1,920.00
	KBK	Prepare for meeting with Misty Porter regarding deposition preparation; meeting with Misty Porter, Geoffrey Vitt and Julia Korkus regarding preparation for Misty Porter's deposition	5.30 175.00/hr	927.50
	KBK	Receive and review emails from Jessica Joseph regarding deposition dates	0.10 175.00/hr	17.50
	KBK	Receive and review email from Jessica Joseph regarding Dr. Hsu subpoena response; prepare and send email response to Jessica Joseph, Don Schroeder and Geoffrey Vitt regarding Dr. Hsu subpoena response	0.90 175.00/hr	157.50
	KBK	Review and revise draft subpoena to Leslie DeMars	0.30 175.00/hr	52.50
	JK	Prepare and meet w/ M. Blanchette Porter, G. Vitt, K.B. Kramer re: MBP deposition preparation	5.50 100.00/hr	550.00
6/11/2019	GJV	Deposition of M. Porter	6.00 320.00/hr	1,920.00
	KBK	Review and revise draft subpoena to Leslie DeMars	0.20 175.00/hr	35.00
	KBK	Prepare list of issues to discuss with Don Schroeder; discuss list of issues with Geoffrey Vitt	0.30 175.00/hr	52.50
	KBK	Deposition of Misty Porter	6.00 175.00/hr	1,050.00
	KBK	Meeting with Don Schroeder and Jessica Joseph regarding pending discovery issues	0.30 175.00/hr	52.50



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/11/2019	KBK Meeting with Julia Korkus and Geoffrey Vitt regarding deposition of Misty Porter	0.60 175.00/hr	105.00
	KBK Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	JK Conf. w/ G. Vitt and K.B. Kramer: M.B. Porter deposition debrief	0.50 100.00/hr	50.00
	JK Uploading documents to ShareFile	2.30 100.00/hr	230.00
	JK Revise ongoing log of production received from defendants	0.70 100.00/hr	70.00
	GJV Conf. K. Kramer and J. Korkus re: M. Porter deposition	0.50 320.00/hr	160.00
6/12/2019	GJV Prepare memorandum on deposition and statement	0.40 320.00/hr	128.00
	KBK Receive and review final version of subpoena to Leslie DeMars for production of documents	0.10 175.00/hr	17.50
	KBK Exchange emails with Don Schroeder and Misty Porter regarding deposition dates	0.10 175.00/hr	17.50
	JK Prod 9 Combo 12 key docs moved to depo prep folders	3.00 100.00/hr	300.00
	JK Receive and review DeMars deposition outline	0.40 100.00/hr	40.00
	JK Review D-H production and upload documents to ShareFile for deposition of DeMars	2.10 100.00/hr	210.00
	JK Receive and review G. Vitt memo on deposition	0.30 100.00/hr	30.00
6/13/2019	GJV Prepare for depositions of D-H witnesses	1.10 320.00/hr	352.00
	KBK Exchange emails with Misty Porter regarding deposition dates; telephone conference with Geoffrey Vitt regarding deposition dates; exchange emails with Jessica Joseph and Don Schroeder regarding deposition dates; telephone conference with Dr. Bernstein's office regarding meeting	0.50 175.00/hr	87.50
	KBK Exchange emails with Geoffrey Vitt regarding depositions and discovery issues	1.00 175.00/hr	175.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/13/2019	JK	Downloading M. Blanchette Porter deposition and exhibits	1.20 100.00/hr	120.00
	JK	Review and prepare memo on who Schroeder said he represents	0.80 100.00/hr	80.00
	JK	Revise ongoing Porter and D-H REI Closure timeline	1.10 100.00/hr	110.00
	JK	Read transcript of M. Blanchette Porter's deposition	2.50 100.00/hr	250.00
	GJV	Exchange e-mails with K. Kramer re: depositions and discovery	1.00 320.00/hr	320.00
6/14/2019	KBK	Exchange emails with Jessica Joseph regarding depositions; receive and review emails from Misty Porter and Geoffrey Vitt regarding Dartmouth-Hitchcock	0.10 175.00/hr	17.50
	KBK	Receive and review correspondence from Don Schroeder regarding risk management interrogatories	0.10 175.00/hr	17.50
	JK	Read exhibits from M. Blanchette Porter deposition	1.80 100.00/hr	180.00
	JK	Uploading documents to sharefile folders in preparation for deposition of defense witnesses	1.50 100.00/hr	150.00
6/15/2019	GJV	Complete memorandum on M. Porter deposition preparation and assembly of sessions and memo on supplemental discovery and email K. Kramer and J. Korkus	0.60 320.00/hr	192.00
6/17/2019	GJV	Review documents re: DeMars deposition questions	0.20 320.00/hr	64.00
	GJV	E-mail K. Kramer and review documents re: Risk management	0.20 320.00/hr	64.00
	GJV	Outline for Risk Management	0.30 320.00/hr	96.00
	GJV	Work on outline for DeMars and Risk Management depositions	0.40 320.00/hr	128.00
	GJV	E-mails with K. Kramer and D. Schroeder re: depositions	0.30 320.00/hr	96.00
	KBK	Exchange emails with Geoffrey Vitt regarding news coverage; exchange emails with Geoffrey Vitt regarding depositions; exchange emails with Misty Porter and Geoffrey Vitt regarding various discovery issues	0.30 175.00/hr	52.50



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/17/2019	KBK Prepare for meeting with Dr. Ira Bernstein	0.20 175.00/hr	35.00
	KBK Revise file memorandum regarding deposition preparation meetings with Misty Porter	2.30 175.00/hr	402.50
	KBK Telephone conference with Misty Porter regarding discovery issues	0.40 175.00/hr	70.00
	KBK Receive and review reply to motion for protective order regarding deposition of Joanne Conroy	0.40 175.00/hr	70.00
	KBK Exchange emails with Geoffrey Vitt regarding motion for protective order regarding deposition of Joanne Conroy	0.20 175.00/hr	35.00
	KBK Email to Don Schroeder and Jessica Joseph regarding motion for protective order	0.20 175.00/hr	35.00
	KBK Email to Don Schroeder and Jessica Joseph regarding deposition scheduling	0.20 175.00/hr	35.00
	JK Receive and review Hsu discovery issues per G. Vitt email	0.60 100.00/hr	60.00
	JK Receive and review memo of depo prep and possible supplemental discovery from G. Vitt and K. B. Kramer	0.70 100.00/hr	70.00
	JK Receive and review correspondence from D. Schroeder	0.10 100.00/hr	10.00
	JK Search D-H production and prepare document set on Zika and Risk Management issues	3.70 100.00/hr	370.00
6/18/2019	GJV Risk Management depo prep	0.20 320.00/hr	64.00
	GJV Outline for Dr. Bernstein meeting and email K. Kramer	0.60 320.00/hr	192.00
	KBK Receive and review email from Don Schroeder regarding depositions; receive and review email from Don Schroeder regarding oral argument on pending motion for protective order; email to Judge Crawford's chambers regarding oral argument on pending motion for protective order	0.20 175.00/hr	35.00
	KBK Exchange emails with Judge Crawford's chambers regarding oral argument; receive and review email from Julia Korkus regarding Maria Padin	0.10 175.00/hr	17.50
	JK Upload consent and DeMars emails on Hsu and Seifer to sharefile	3.40 100.00/hr	340.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/19/2019	GJV	Review Bernstein memo and email K. Kramer	0.20 320.00/hr	64.00
	GJV	Meeting in Burlington with Dr. Bernstein and K. Kramer and review outline; conf. K. Kramer	4.00 320.00/hr	1,280.00
	KBK	Exchange emails with Geoffrey Vitt regarding Dr. Bernstein meeting	0.40 175.00/hr	70.00
	KBK	Round trip travel from Middlebury to UVMCMC for meeting with Dr. Bernstein	2.00 175.00/hr	350.00
	KBK	Interview and meeting with Dr. Bernstein and Geoffrey Vitt	0.80 175.00/hr	140.00
	KBK	Meeting with Geoffrey Vitt regarding strategy and next steps	0.20 175.00/hr	35.00
	KBK	Exchange emails with Misty Porter regarding Navid Esfandiari and next steps	0.20 175.00/hr	35.00
	KBK	Prepare memorandum to file regarding meeting with Dr. Ira Bernstein	1.90 175.00/hr	332.50
	KBK	Exchange emails with Geoffrey Vitt regarding deposition scheduling and other discovery issues	0.30 175.00/hr	52.50
	JK	Prepare documents for deposition of Conroy	2.80 100.00/hr	280.00
	JK	Review D-H production and prepare document set for G. Vitt's meeting w/ Dr. I. Bernstein; brief conf. w/ G. Vitt	0.70 100.00/hr	70.00
	JK	Receive and review K.B. Kramer memo on meeting w/ Bernstein	0.20 100.00/hr	20.00
6/20/2019	GJV	Several emails with D. Schroeder and K. Kramer re: depositions	0.20 320.00/hr	64.00
	GJV	E-mails with D. Schroeder and K. Kramer re: Risk Management depositions and DeMars	0.30 320.00/hr	96.00
	GJV	Review K. Kramer memorandum re: interview with resident	0.20 320.00/hr	64.00
	GJV	E-mails to D. Schroeder re: Hsu documents	0.10 320.00/hr	32.00
	JK	Receive and review K.B. Kramer memo on REI fellowship interview	0.20 100.00/hr	20.00

Misty Porter			Page	10
			<u>Hrs/Rate</u>	<u>Amount</u>
6/20/2019	JK	Review and upload documents to sharefile per defense witness depositions	3.70 100.00/hr	370.00
6/21/2019	GJV	Deposition preparation	0.20 320.00/hr	64.00
	GJV	Herrick outline preparation	0.50 320.00/hr	160.00
	KBK	Receive and review email from Geoffrey Vitt regarding document production by Albert Hsu; exchange emails with Misty Porter regarding deposition scheduling	0.30 175.00/hr	52.50
	KBK	Prepare list of depositions and interviews; circulate list to Geoffrey Vitt and Julia Korkus	0.40 175.00/hr	70.00
	KBK	Telephone conference with Michelle Russell; prepare memorandum to file regarding telephone conference with Michelle Russell	1.20 175.00/hr	210.00
	KBK	Receive and review court hearing notice on motion for protective order regarding deposition of Joanne Conroy	0.10 175.00/hr	17.50
6/22/2019	GJV	Outline for Herrick depo and email with M. Porter	0.60 320.00/hr	192.00
	GJV	E-mails with M. Porter re: training for residents and interns	0.20 320.00/hr	64.00
	GJV	Herrick outline	1.00 320.00/hr	320.00
6/23/2019	GJV	Review M. Porter emails and outline for Herrick depo	0.60 320.00/hr	192.00
	GJV	Multiple e-mails re: residency, fellows, closing REI and work on Herrick outline	2.10 320.00/hr	672.00
	KBK	Exchange emails with Geoffrey Vitt and Misty Porter regarding depositions and strategy	0.30 175.00/hr	52.50
	KBK	Revise theme of the case document	1.30 175.00/hr	227.50
	KBK	Prepare questions for Joan Barthold; call to Joan Barthold and leave messages	0.10 175.00/hr	17.50
	KBK	Prepare memorandum to file regarding telephone conference with Michelle Russell	0.50 175.00/hr	87.50
6/24/2019	GJV	Prepare for Herrick deposition	0.90 320.00/hr	288.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/24/2019	GJV	Review memorandum re: Dr. Russell; t/c K. Kramer re: depositions, witnesses, motion for attorneys fees, review of interrogatories and new requests to produce	1.70 320.00/hr	544.00
	GJV	Review K. Kramer emails re: discovery issues, and witnesses and email K. Kramer re: witnesses	0.40 320.00/hr	128.00
	KBK	Exchange emails with Geoffrey Vitt regarding informal interviews; exchange emails with Misty Porter regarding discovery	1.00 175.00/hr	175.00
	KBK	Prepare memorandum to file regarding interview with Michelle Russell	1.30 175.00/hr	227.50
	KBK	Prepare list of pending discovery issues	0.20 175.00/hr	35.00
	KBK	Exchange emails with Julia Korkus; exchange emails with Geoffrey Vitt regarding pending discovery issues	0.20 175.00/hr	35.00
	KBK	Call to Judy McBean and leave messages	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt regarding pending discovery issues	0.70 175.00/hr	122.50
	GJV	T/c with K. Kramer re: pending discover	0.70 320.00/hr	224.00
6/25/2019	KBK	Exchange emails with Geoffrey Vitt regarding strategy and discovery issues; email to Don Schroeder and Jessica Joseph regarding pending requests	0.80 175.00/hr	140.00
	KBK	Review DH's supplemental response to third set of interrogatories regarding risk management	0.20 175.00/hr	35.00
	KBK	Telephone conference with J. Korkus regarding Maria Padin	1.00 175.00/hr	175.00
	KBK	Receive and review email from Misty Porter regarding risk management	0.10 175.00/hr	17.50
	KBK	Exchange emails with Misty Porter and Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00
	GJV	Several emails re: Risk Management issues and documents generated re: Albert's cases and Risk Management	0.60 320.00/hr	192.00
	GJV	Several emails with M. Porter and K. Kramer and review Amended Discovery Schedule and consider additional requests	0.50 320.00/hr	160.00
	GJV	Review M. Porter email	0.10 320.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/25/2019	GJV	Prepared draft of additional requests	0.40 320.00/hr	128.00
	GJV	Outline for interviews with witnesses and multiple emails with M. Porter re: documents requested and witnesses	0.60 320.00/hr	192.00
	GJV	Emails with K. Kramer re: motion, witnesses and experts	0.40 320.00/hr	128.00
	JK	Emails; prepare and telephone conference w/ K.B. Kramer re: topics concerning Maria Padin and potential for deposition	1.10 100.00/hr	110.00
	JK	Search, review and prepare key doc set for K.B.Kramer and G, Vitt review per depositions of defense witnesses.	4.10 100.00/hr	410.00
	JK	Receive and review Defendant's supplemental answer to plaintiff's third set of interrogatories.	0.20 100.00/hr	20.00
6/26/2019	KBK	Receive and review email from Jessica Joseph regarding outstanding discovery issues; exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt regarding damages	0.50 175.00/hr	87.50
	KBK	Exchange emails with Geoffrey Vitt regarding witnesses; revise interview outline for D-H fellows	0.50 175.00/hr	87.50
	KBK	E-mail to M. Porter regarding Judy McBean	0.10 175.00/hr	17.50
	KBK	Email to former UVM REI fellows; telephone conference with Geoffrey Vitt regarding discovery issues	0.90 175.00/hr	157.50
	KBK	Prepare for Beth Todd deposition	1.10 175.00/hr	192.50
	KBK	Review document set from Julia Korkus	0.40 175.00/hr	70.00
	KBK	Call to Joan Barthold and leave messages	0.10 175.00/hr	17.50
	GJV	J. Joseph email re: discovery and email K. Kramer re: next step	0.20 320.00/hr	64.00
	GJV	Outline for interview w/ residents and emails to K. Kramer and review modified outline	0.70 320.00/hr	224.00
	GJV	Review issue of possible expert and emotional distress damages; emails with K. Kramer re: emotional distress damages	0.50 320.00/hr	160.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
6/26/2019	GJV T/c K. Kramer re: Dr. McBean and Dr. Padin	0.20 320.00/hr	64.00
	GJV Outline for interviews with witnesses	0.90 320.00/hr	288.00
	JK Email summary re: new document review set to K.B.Kramer and G. Vitt for upcoming depositions of defense witnesses.	0.30 100.00/hr	30.00
	JK Search, review and prepare key doc set for K.B.Kramer and G, Vitt review per depositions of defense witnesses.	4.00 100.00/hr	400.00
	JK Receive and review K. B. Kramer's revision to case themes; gather related key documents.	0.50 100.00/hr	50.00
6/27/2019	KBK Exchange emails with Geoffrey Vitt and Julia Korkus regarding discovery issues and informal interviews	0.30 175.00/hr	52.50
	KBK Review set of documents produced from D-H; deposition preparation for Ed Merrens, Beth Todd and Maria Padin	2.40 175.00/hr	420.00
	KBK Exchange emails with Julia Korkus regarding effect of closing REI; exchange emails with Geoffrey Vitt regarding ENE and scheduling issues	0.70 175.00/hr	122.50
	KBK Deposition preparation for Beth Todd	1.30 175.00/hr	227.50
	KBK Telephone conference with Joe Findley; email to Geoffrey Vitt and Julia Korkus regarding Joe Findley; prepare memorandum to file regarding interview with Joe Findley	1.90 175.00/hr	332.50
	GJV Multiple e-mails	0.30 320.00/hr	96.00
	GJV E-mails with K. Kramer re. mediation	0.20 320.00/hr	64.00
	GJV E-mail S. Parent	0.10 320.00/hr	32.00
	GJV Emails with D. Schroeder and K. Kramer re: Risk Management and review D. Schroeder letter and objections to deposition notice	0.60 320.00/hr	192.00
	GJV Outline for motion	0.30 320.00/hr	96.00
	JK Email from G. Vitt re: Board meetings; review productions and prepare document set for review; emails w/ K. B. Kramer re: downstream effects email of DeMars	1.40 100.00/hr	140.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/28/2019	KBK	Draft memorandum to file regarding interview with Joe Findley; circulate memorandum to Geoffrey Vitt and Julia Korkus	0.80 175.00/hr	140.00
	KBK	Receive and review correspondence from Jessica Joseph regarding Rule 30(b)(6) deposition notice; exchange emails with Jessica Joseph regarding meet-and-confer for Rule 30(b)(6) deposition of Risk Management; email to Geoffrey Vitt regarding same	0.40 175.00/hr	70.00
	KBK	Telephone conference with Geoffrey Vitt regarding motion to compel on Rule 30(b)(6) deposition of Risk Management	0.30 175.00/hr	52.50
	KBK	Receive and review voicemail message from Jennifer Dundee; brief telephone conference with Jennifer Dundee	0.10 175.00/hr	17.50
	KBK	Exchange emails with Jessica Joseph and Geoffrey Vitt regarding objections to Rule 30(b)(6) deposition of Risk Management; exchange emails with Jessica Joseph regarding deposition of Heather Gunnell	0.20 175.00/hr	35.00
	KBK	Telephone conference with Jennifer Dundee	0.70 175.00/hr	122.50
	KBK	Prepare memorandum to file regarding telephone conference with Jennifer Dundee	1.10 175.00/hr	192.50
	KBK	Exchange emails with Geoffrey Vitt regarding next steps	0.20 175.00/hr	35.00
	GJV	Work on motion to compel re: Risk Management	2.90 320.00/hr	928.00
	JK	Prepare risk management documents set	2.30 100.00/hr	230.00
	GJV	E-mail with K. Kramer re: strategy and discovery	0.20 320.00/hr	64.00
6/29/2019	GJV	Motion to compel	1.80 320.00/hr	576.00
6/30/2019	KBK	Receive and review emails from Geoffrey Vitt regarding risk management	0.10 175.00/hr	17.50
	GJV	E-mails with D. Schroeder	0.10 320.00/hr	32.00
	GJV	Motion to compel re: Risk Management	1.60 320.00/hr	512.00
For professional services rendered			208.10	\$39,874.00





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## Additional Charges :

	<u>Amount</u>
6/11/2019 Deposition Costs for: Verbatim Reporter	274.75
6/19/2019 Parking Vermont Medical Center	2.50
Lunch: Moe's	13.18
Total costs	<u>\$290.43</u>
Total amount of this bill	<u>\$40,164.43</u>
Previous balance	\$32,894.45
Balance due	<u><u>\$73,058.88</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jeffrey J. Vitt	66.20	320.00	\$21,184.00
Jana Korkus	74.90	100.00	\$7,490.00
Katherine B. Kramer	64.00	175.00	\$11,200.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

August 12, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13708

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
7/1/2019	GJV	Motion to compel re: Risk Management	1.50 320.00/hr	480.00
	GJV	Review Zika and other documents	0.30 320.00/hr	96.00
	GJV	Emails with KBK re: discovery issues, and emails with J. Joseph re: DeMars subpoena	0.20 320.00/hr	64.00
	JK	Receive and review D-H counsel letter re: objections to Rule 30(b)(6) notice.	0.20 100.00/hr	20.00
	JK	Deposition preparation re: Risk Management	6.20 100.00/hr	620.00
	KBK	Exchange emails with Geoffrey Vitt regarding risk management	0.20 175.00/hr	35.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery issues	0.30 175.00/hr	52.50
7/2/2019	GJV	Several emails with K. Kramer re: DH document production issues	0.20 320.00/hr	64.00
	GJV	T/c K. Kramer re: discovery issues	0.30 320.00/hr	96.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/2/2019	GJV	Outline risk management issue	0.20 320.00/hr	64.00
	JK	Deposition preparation re: Risk Management	5.70 100.00/hr	570.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery responses; email to Jessica Joseph regarding outstanding discovery issues	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt regarding upcoming hearing on motion for protective order and outstanding discovery issues	0.50 175.00/hr	87.50
	KBK	Call Judy McBean and leave voicemail message	0.10 175.00/hr	17.50
	KBK	Exchange emails with Misty Porter regarding witness interviews	0.30 175.00/hr	52.50
7/3/2019	GJV	E-mail D. Schroeder	0.20 320.00/hr	64.00
	GJV	Prepare for conference call with D, Schroeder and J. Joseph re: Risk Management and conference call	0.80 320.00/hr	256.00
	GJV	E-mails with J. Joseph re: Risk Management and email K. Kramer	0.20 320.00/hr	64.00
7/5/2019	JK	Receive and review press release from MBP re: NH bill on fertility coverage	0.10 100.00/hr	10.00
	GJV	Review J. Joseph email re: Risk Management, review 30(b)(6) Notice; email KBK re: Risk Management issue and email MP re: same	0.70 320.00/hr	224.00
	GJV	Review Hsu documents and email K. Kramer	0.20 320.00/hr	64.00
	GJV	Review Hsu Documents	0.20 320.00/hr	64.00
7/6/2019	KBK	Receive and review emails from Geoffrey Vitt and Jessica Joseph regarding discovery issues	0.80 175.00/hr	140.00
	KBK	Telephone conference with Geoffrey Vitt regarding upcoming hearing on motion for protective order and outstanding discovery issues	0.60 175.00/hr	105.00
	KBK	Prepare for hearing on motion for protective order regarding deposition of Joanne Conroy	2.00 175.00/hr	350.00
	GJV	Emails with K. Kramer and review scope of Risk Management deposition and Notice; t/c K. Kramer re: Risk Management deposition	0.70 320.00/hr	224.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/7/2019	JK	1.00 100.00/hr	100.00
	KBK	0.40 175.00/hr	70.00
	KBK	4.90 175.00/hr	857.50
	GJV	0.20 320.00/hr	64.00
7/8/2019	JK	0.50 100.00/hr	50.00
	JK	0.20 100.00/hr	20.00
	JK	2.20 100.00/hr	220.00
	KBK	1.80 175.00/hr	315.00
	KBK	1.10 175.00/hr	192.50
	KBK	1.00 175.00/hr	175.00
	KBK	2.00 175.00/hr	350.00
	KBK	1.00 175.00/hr	NO CHARGE
	KBK	0.30 175.00/hr	52.50
	KBK	0.50 175.00/hr	87.50
	KBK	1.00 175.00/hr	175.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/8/2019	GJV	Travel to Rutland and hearing before Judge Crawford; conf. K. Kramer; conf K. Kramer and D.Schroeder re: Risk Management issue	3.00 320.00/hr	960.00
	GJV	Review Schroeder letter and objection to DeMars subpoena; review K. Kramer email and t/c K. Kramer re: reply to objections	0.30 320.00/hr	96.00
7/9/2019	JK	Receive and review D-H counsel email re: DeMars response to subpoena.	0.20 100.00/hr	20.00
	JK	Review D-H HSU Production 2	1.50 100.00/hr	150.00
	JK	Deposition preparation per Elizabeth Todd and Risk Management	1.60 100.00/hr	160.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition of Maria Padin	0.20 175.00/hr	35.00
	GJV	Review M. Porter email re: REI services,; emails with K. Kramer re: depositions	0.20 320.00/hr	64.00
7/10/2019	SN	Conf. With GJV	0.30 80.00/hr	24.00
	KBK	Prepare fifth amended discovery schedule; telephone conference with Geoffrey Vitt regarding discovery issues	0.50 175.00/hr	87.50
	KBK	Receive and review emails from Geoffrey Vitt; receive and review email to Don Schroeder and Jessica Joseph regarding depositions; receive and review email from Misty Porter regarding services of the REI Division; exchange emails with Liz Bower regarding depositions	0.30 175.00/hr	52.50
	KBK	Receive and review emails from Jessica Joseph regarding production of documents from Leslie DeMars and regarding deposition of Joanne Conroy; exchange emails with Geoffrey Vitt regarding deposition of Joanne Conroy; email to Jessica Joseph and Don Schroeder regarding deposition of Joanne Conroy	0.20 175.00/hr	35.00
	GJV	T/c K. Kramer and review emails	0.20 320.00/hr	64.00
	GJV	Review notice of deposition for M. Padin	0.10 320.00/hr	32.00
	GJV	Several emails with J. Joseph and K. Kramer re: Conroy deposition and DeMars affidavit	0.20 320.00/hr	64.00
	GJV	Conference with S. Nunan	0.30 320.00/hr	96.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/11/2019	KBK Exchange emails with Geoffrey Vitt regarding Leslie DeMars subpoena	0.10 175.00/hr	17.50
	GJV Several emails	0.20 320.00/hr	64.00
	GJV Email w J. Joseph and K. Kramer re: DeMars subpoena	0.20 320.00/hr	64.00
	GJV Review Hsu documents	0.30 320.00/hr	96.00
7/12/2019	JK Receive and review D-H Production 13, emails to G. Vitt and K. B. Kramer; comparison w/ previous documents, privilege log, court order.	2.30 100.00/hr	230.00
	KBK Exchange emails with Geoffrey Vitt regarding thirteenth document production from Dartmouth-Hitchcock and other discovery issues	0.20 175.00/hr	35.00
	KBK Exchange emails with Geoffrey Vitt regarding confidentiality and protective order; review protective order entered by the court and assess changes needed; review thirteenth production of documents from Dartmouth-Hitchcock	1.30 175.00/hr	227.50
7/13/2019	KBK Review thirteenth production of documents from D-H; email to Geoffrey Vitt and Julia Korkus regarding privilege log; email to Geoffrey Vitt and Julia Korkus regarding Risk Management interrogatory	2.70 175.00/hr	472.50
	KBK Telephone conference with Geoffrey Vitt regarding discovery issues and strategy	0.50 175.00/hr	87.50
	KBK Receive and review emails from Geoffrey Vitt and Misty Porter regarding discovery issues and strategy	0.30 175.00/hr	52.50
	GJV Multiple emails with K. Kramer and M. Porter and review emails re: 13th production	1.00 320.00/hr	320.00
	GJV Review privilege log and analyze recent production of documents	0.30 320.00/hr	96.00
7/14/2019	GJV E-mails	0.20 320.00/hr	64.00
	GJV Herrick deposition prep and review Hsu documents	0.50 320.00/hr	160.00
7/15/2019	SN Conf. With KBK RE discovery issues	0.40 80.00/hr	32.00
	JK Deposition preparation per Elizabeth Todd: documents and review K. B. Kramer outline	2.40 100.00/hr	240.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
7/15/2019	KBK Receive and review emails from Julia Korkus and Jessica Joseph regarding discovery issues; telephone conference with Geoffrey Vitt regarding depositions and next steps; email to Jo LaMarche in Judge Crawford's chambers regarding status conference; exchange emails with Jo LaMarche	0.40 175.00/hr	70.00
	KBK Prepare for deposition of Beth Todd	2.50 175.00/hr	437.50
	KBK Telephone conference with Sarah Nunan regarding privilege issues and other discovery issues	0.40 175.00/hr	70.00
	KBK Telephone conference with Geoffrey Vitt regarding depositions; email to Don Schroeder and Jessica Joseph regarding privilege log	0.50 175.00/hr	87.50
	GJV T/c K. Kramer re: privilege issue and depositions	0.20 320.00/hr	64.00
	GJV Review documents for deposition	0.20 320.00/hr	64.00
	GJV E-mails re: status conference	0.20 320.00/hr	64.00
	GJV Review 13th production documents	0.80 320.00/hr	256.00
	GJV Prepare for Herrick deposition and review Hsu documents	1.20 320.00/hr	384.00
	GJV Review documents for Herrick deposition	0.80 320.00/hr	256.00
	GJV Prepare for deposition and review Hsu documents	1.20 320.00/hr	384.00
7/16/2019	JK Deposition preparation per Elizabeth Todd; document review and phone call w/ K. B. Kramer to discuss outline	2.70 100.00/hr	270.00
	KBK Prepare for deposition of Beth Todd; telephone conference with Geoffrey Vitt regarding deposition of Beth Todd; telephone conference with Julia Korkus regarding deposition of Beth Todd; exchange emails with Geoffrey Vitt regarding deposition outline for Beth Todd	6.90 175.00/hr	1,207.50
	GJV Email K. Kramer re: Todd deposition and review Todd exhibits and review documents produced by DH to prepare for deposition	1.10 320.00/hr	352.00
	GJV Email KBK re: discovery	0.20 320.00/hr	64.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/16/2019	GJV	Prepare for Risk Management deposition	2.00 320.00/hr	640.00
	GJV	Review Todd outline	0.90 320.00/hr	288.00
7/17/2019	SN	Conf with JK RE privilege logs and review orders from Crawford	1.00 80.00/hr	80.00
	SN	Review documents of the 13th production	0.70 80.00/hr	56.00
	SN	Conf with KBK on privilege work for upcoming hearing	0.30 80.00/hr	24.00
	SN	Conf. with KBK RE 30(b)6 deposition	0.20 80.00/hr	16.00
	JK	Conf. w/ G. Vitt; review & prepare summary of Production 13 from D-H for deposition preparation; mtg with M. Blanchette Porter, G. Vitt and K. B. Kramer.	3.50 100.00/hr	350.00
	JK	Privilege Log discussions with S. Nunan	0.60 100.00/hr	60.00
	JK	Review documents for redaction compliance; prepare summary of privilege logs, production sets, and motion to compel correspondence.	1.30 100.00/hr	130.00
	KBK	Travel to Norwich	1.50 175.00/hr	262.50
	KBK	Prepare for deposition of Beth Todd; deposition of Beth Todd	7.20 175.00/hr	1,260.00
	KBK	Meeting with Sarah Nunan regarding strategy; meetings with Geoffrey Vitt and Misty Porter regarding deposition of Beth Todd and other discovery issues	1.50 175.00/hr	262.50
	KBK	Travel from Norwich	1.50 175.00/hr	NO CHARGE
	GJV	Review documents to prepare for deposition, conference MP and KBK, and Todd deposition	9.60 320.00/hr	3,072.00
7/18/2019	JK	Complete review of documents for redaction compliance; prepare summary of privilege logs, production sets, and motion to compel correspondence; email to S. Nunan.	2.50 100.00/hr	250.00
	JK	Deposition preparation per Daniel Herrick: document review.	4.50 100.00/hr	450.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/18/2019	KBK Travel to Norwich	1.50 175.00/hr	262.50
	KBK Meeting with Misty Porter and Geoffrey Vitt to prepare for Misty Porter's deposition; deposition of Misty Porter	5.60 175.00/hr	980.00
	KBK Review and assess issues with DHMC's privilege log; meeting with Julia Korkus regarding privilege log issues	0.40 175.00/hr	70.00
	KBK Travel from Norwich	1.50 175.00/hr	NO CHARGE
	GJV M. Porter deposition	5.30 320.00/hr	1,696.00
	GJV Email K. Kramer	0.10 320.00/hr	32.00
	GJV Outline for Risk Management deposition	1.30 320.00/hr	416.00
7/19/2019	SN Review GJV emails on privilege log; conf with JK RE redacted documents and privilege log	0.30 80.00/hr	24.00
	SN Privilege log issues, preparing summary for argument	1.40 80.00/hr	112.00
	SN Reviewing three discovery orders; preparing chart of production, orders and privilege logs for hearing	1.70 80.00/hr	136.00
	SN Teleconference with KBK RE discovery issues to raise with the court	0.50 80.00/hr	40.00
	JK Review revised privilege log and mails w/ KBK, GJV, and SHN; conf. w/ SHN.	2.00 100.00/hr	200.00
	JK Conf. w/ G. Vitt on Risk Management deposition preparation.	0.20 100.00/hr	20.00
	JK Deposition preparation per Daniel Herrick: document review and scanning set for KBK, GJV, and SHN review.	5.00 100.00/hr	500.00
	KBK Exchange emails with Geoffrey Vitt regarding privilege log; receive and review revised privilege log from Jessica Joseph	0.80 175.00/hr	140.00
	KBK Exchange emails with Liz Bower regarding depositions; receive and review deposition chart from Liz Bower; revise deposition chart	0.10 175.00/hr	17.50
	KBK Receive and review discovery chart from Sarah Nunan in preparation for status conference; telephone conference with Sarah Nunan; exchange emails with Sarah Nunan	1.30 175.00/hr	227.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2019	GJV	Review Privilege log and email K. Kramer	0.30 320.00/hr	96.00
	GJV	Review documents for Risk Management deposition	0.80 320.00/hr	256.00
	GJV	Privilege issues	0.20 320.00/hr	64.00
	GJV	Review Hsu documents	0.30 320.00/hr	96.00
	GJV	Review exhibits and prepare for Risk Management deposition	1.60 320.00/hr	512.00
7/20/2019	SN	Conf. With GJV RE deposition of Risk Management	0.30 80.00/hr	24.00
	GJV	Risk Management deposition preparation	5.50 320.00/hr	1,760.00
7/21/2019	SN	Conf. with GJV on deposition of D. Herrick; prepare documents for deposition	1.10 80.00/hr	88.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition planning	0.20 175.00/hr	35.00
	GJV	Prepare for Herrick and Risk Management depositions including conference S. Nunan	6.50 320.00/hr	2,080.00
7/22/2019	SN	Review D. Herrick documents; prepare timeline of quotes for deposition preparation	4.60 80.00/hr	368.00
	SN	Conf with GJV RE Herrick questions and prepping for deposition	1.20 80.00/hr	96.00
	JK	Prepare and file notice of deposition of Heather Gunnell	0.40 100.00/hr	40.00
	JK	Deposition preparation per Risk Management: zika, closure and specimens, complaints, consent document review.	5.20 100.00/hr	520.00
	KBK	Exchange emails with Geoffrey Vitt regarding depositions	0.40 175.00/hr	70.00
	KBK	Prepare for status conference	1.50 175.00/hr	262.50
	KBK	Prepare for deposition of Daniel Herrick	0.90 175.00/hr	157.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/22/2019	KBK Telephone conference with Geoffrey Vitt regarding status conference	0.30 175.00/hr	52.50
	KBK Email to Misty Porter regarding depositions	0.20 175.00/hr	35.00
	KBK Telephone conference with Joan Barthold; email to Geoffrey Vitt and Julia Korkus regarding telephone conference with Joan Barthold	1.50 175.00/hr	262.50
	GJV Herrick deposition prep	6.70 320.00/hr	2,144.00
	GJV T/c K. Kramer re: depositions	0.40 320.00/hr	128.00
7/23/2019	JK Deposition preparation per Daniel Herrick: document review and outline of questions for G. Vitt review	2.50 100.00/hr	250.00
	JK Deposition preparation per Risk Management: document review.	2.70 100.00/hr	270.00
	KBK Exchange emails with Misty Porter and Geoffrey Vitt regarding status conference and Risk Management depositions	0.20 175.00/hr	35.00
	KBK Review and revise deposition outline for Daniel Herrick	0.80 175.00/hr	140.00
	KBK Prepare for status conference	0.40 175.00/hr	70.00
	KBK Travel to Rutland for status conference	1.00 175.00/hr	175.00
	KBK Prepare for deposition of Daniel Herrick; telephone conference with Geoffrey Vitt regarding status conference	0.30 175.00/hr	52.50
	KBK Status conference with Judge Crawford regarding scheduling order, privilege log, and other issues	1.00 175.00/hr	175.00
	KBK Return travel from Rutland	1.00 175.00/hr	NO CHARGE
	KBK Exchange emails with Geoffrey Vitt and Misty Porter regarding depositions and status conference; review documents from Julia Korkus to prepare for Daniel Herrick deposition	0.50 175.00/hr	87.50
	KBK Revise scheduling order and motion to amend scheduling order, and circulate to counsel	0.20 175.00/hr	35.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
7/23/2019	KBK	Status conference with Judge Crawford regarding scheduling order, privilege log, and other issues	0.30 175.00/hr	52.50
	KBK	Prepare for Risk Management deposition	1.00 175.00/hr	175.00
	KBK	Receive and review emails from Misty Porter and Geoffrey Vitt; meeting with Geoffrey Vitt to prepare for deposition of Karen Boedtke (Risk Management)	1.00 175.00/hr	175.00
	GJV	Prepare for Risk Management and Herrick depositions	4.30 320.00/hr	1,376.00
	GJV	Status conference call Judge Crawford and email K. Kramer	1.00 320.00/hr	320.00
	GJV	Email Schroeder and email K. Kramer	0.30 320.00/hr	96.00
	GJV	E-mail K. Kramer	0.20 320.00/hr	64.00
7/24/2019	SN	Preparing exhibits for deposition and reviewing with GJV	2.10 80.00/hr	168.00
	SN	Attending deposition of Karen Boedtke	4.60 80.00/hr	368.00
	SN	Attending post-deposition conference with GJV and KBK	0.40 80.00/hr	32.00
	SN	Conf with KBK and GJV RE Herrick	0.50 80.00/hr	40.00
	SN	Conf with KBK RE next depositions	0.20 80.00/hr	16.00
	JK	Conf. w/ G. Vitt and prepare thyroid case/at-risk patient summary of documents for possible exhibit in Risk Management deposition	0.60 100.00/hr	60.00
	JK	Deposition preparation per Ed Merrens; document review	5.00 100.00/hr	500.00
	KBK	Deposition of Karen Boedtke (Risk Management); meetings with Sarah Nunan and Geoffrey Vitt regarding deposition	4.50 175.00/hr	787.50
	KBK	Prepare for deposition of Daniel Herrick	0.40 175.00/hr	70.00
	KBK	Email to Geoffrey Vitt regarding damages	0.10 175.00/hr	17.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
7/24/2019	KBK	Meeting with Geoffrey Vitt regarding deposition of Daniel Herrick; meeting with Geoffrey Vitt and Sarah Nunan regarding deposition of Daniel Herrick and other discovery issues	2.20 175.00/hr	385.00
	KBK	Travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Travel to Norwich for deposition	1.50 175.00/hr	262.50
	GJV	Deposition of Karen Boedtker and preparation	5.70 320.00/hr	1,824.00
	GJV	Prepare for Herrick deposition	2.90 320.00/hr	928.00
7/25/2019	SN	Prepared with GJV for deposition and prepared last exhibits	1.70 80.00/hr	136.00
	SN	Attended deposition of Daniel Herrick	5.00 80.00/hr	400.00
	JK	Deposition preparation per Ed Merrens: document review and scanning set for KBK, GJV, SHN review.	6.50 100.00/hr	650.00
	KBK	Prepare for Daniel Herrick deposition; attend and take notes during deposition of Daniel Herrick; meeting with Geoffrey Vitt, Sarah Nunan and Julia Korkus regarding Daniel Herrick deposition	6.60 175.00/hr	1,155.00
	KBK	Email to Misty Porter with update; email to Misty Porter regarding informal interviews	0.40 175.00/hr	70.00
	KBK	Prepare for Ed Merrens deposition	0.30 175.00/hr	52.50
	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Travel to Norwich	1.50 175.00/hr	262.50
	GJV	Prepare for and take Herrick deposition	8.50 320.00/hr	2,720.00
7/26/2019	JK	Deposition preparation per Heather Gunnell: documents for review	5.40 100.00/hr	540.00
	KBK	Exchange emails with Geoffrey Vitt and Misty Porter regarding additional discovery	0.20 175.00/hr	35.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2019	KBK	Draft and finalize memorandum to file regarding Joan Barthold; circulate memorandum to Geoffrey Vitt and Julia Korkus	2.40 175.00/hr	420.00
	KBK	Email to Robert Bancroft (damages expert) regarding expert report	0.10 175.00/hr	17.50
	KBK	Exchange emails with Jessica Joseph regarding discovery schedule; email to Liz Bower regarding filing of discovery schedule	0.10 175.00/hr	17.50
	KBK	Prepare for deposition of Ed Merrens	2.50 175.00/hr	437.50
7/28/2019	KBK	Prepare for deposition of Ed Merrens	4.20 175.00/hr	735.00
	KBK	Email to Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00
	GJV	Email K. Kramer re: Merrens deposition	0.20 320.00/hr	64.00
	GJV	Review materials for DeMars deposition and prepare memorandum on trial proof	0.90 320.00/hr	288.00
	GJV	Supplemental discovery to DH	0.40 320.00/hr	128.00
7/29/2019	SN	Meeting with KBK and GJV RE deposition of Ed Merrens	3.60 80.00/hr	288.00
	SN	Preparing exhibits for deposition of Ed Merrens	2.10 80.00/hr	168.00
	SN	Conf with KBK to review outlines and review exhibit content	2.10 80.00/hr	168.00
	JK	Deposition preparation per Heather Gunnell: document review.	5.50 100.00/hr	550.00
	KBK	Prepare for deposition of Heather Gunnell	0.50 175.00/hr	87.50
	KBK	Meeting with Geoffrey Vitt and Sarah Nunan regarding deposition of Ed Merrens; prepare for deposition of Ed Merrens	6.50 175.00/hr	1,137.50
	KBK	Travel to Norwich	1.50 175.00/hr	262.50
	GJV	Merrens deposition prep	4.70 320.00/hr	1,504.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/30/2019	SN	Attending deposition of Ed Merrens am	2.20 80.00/hr	176.00
	SN	Attending deposition of Ed Merrens pm	1.60 80.00/hr	128.00
	SN	Conf with KBK RE deposition topics of Heather Gunnell	0.70 80.00/hr	56.00
	JK	Deposition preparation per Ed Merrens: document review.	2.40 100.00/hr	240.00
	JK	Deposition preparation per Heather Gunnell: document review and copying set for K. B. Kramer review.	4.50 100.00/hr	450.00
	KBK	Prepare for deposition of Ed Merrens	3.00 175.00/hr	525.00
	KBK	Meeting with Geoffrey Vitt and Sarah Nunan regarding deposition of Ed Merrens and deposition of Heather Gunnell	0.80 175.00/hr	140.00
	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Take deposition of Ed Merrens; meetings with Geoffrey Vitt regarding deposition of Ed Merrens during deposition breaks	8.50 175.00/hr	1,487.50
	GJV	Merrens deposition	10.50 320.00/hr	3,360.00
7/31/2019	JK	Deposition preparation per Heather Gunnell	2.30 100.00/hr	230.00
	KBK	Receive and review emails from Jessica Joseph regarding production of documents for in camera review and regarding privilege log	0.10 175.00/hr	17.50
	KBK	E-mail to Misty Porter regarding deposition of Ed Merrens	0.20 175.00/hr	35.00
	KBK	Prepare for deposition of Heather Gunnell	7.40 175.00/hr	1,295.00
	GJV	Memorandum on Conroy deposition and provide information re: Merrens deposition	1.30 320.00/hr	416.00
	GJV	Prepare supplemental discovery to DH	0.50 320.00/hr	160.00
	GJV	Outline for DeMars deposition	0.90 320.00/hr	288.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
7/31/2019 GJV Trial issues memorandum	0.70 320.00/hr	224.00
For professional services rendered	365.20	\$66,645.00
Additional Charges :		
6/19/2019 Burlington Expense		13.18
Parking		2.50
7/17/2019 Deposition Costs for North Country Court Reporters		1,010.95
7/24/2019 Verbatim Reporters		625.35
7/29/2019 Lunch		26.06
7/30/2019 lunch		68.64
Total costs		<u>\$1,746.68</u>
Total amount of this bill		<u>\$68,391.68</u>
Previous balance		<u>\$73,058.88</u>
7/12/2019 Payment - thank you		<u>(\$20,164.43)</u>
7/16/2019 Payment - thank you		<u>(\$20,000.00)</u>
Total payments and adjustments		<u>(\$40,164.43)</u>
Balance due		<u><u>\$101,286.13</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	103.30	320.00	\$33,056.00
Julia Korkus	89.40	100.00	\$8,940.00
Katherine B. Kramer	122.20	175.00	\$21,385.00
Sarah Nunan	40.80	80.00	\$3,264.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

September 11, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13773

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2019 KBK Travel to Norwich	1.50 175.00/hr	NO CHARGE
KBK Exchange emails with Geoffrey Vitt regarding witnesses; exchange emails with Bob Bancroft regarding telephone conference	0.20 175.00/hr	35.00
KBK Prepare for Heather Gunnell deposition; telephone conference with Geoffrey Vitt regarding deposition of Heather Gunnell; telephone conference with Julia Korkus regarding Gunnell deposition	3.80 175.00/hr	665.00
KBK Prepare for deposition of Heather Gunnell	2.30 175.00/hr	402.50
GJV E-mail M. Porter	0.10 320.00/hr	32.00
GJV Emails with K. Kramer re: Gunnell and outstanding discovery	0.30 320.00/hr	96.00
GJV Supplemental requests and interrogatories	1.40 320.00/hr	448.00
GJV Letter to D. Schroeder re: depositions and subpoena	0.20 320.00/hr	64.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2019	GJV	Review documents and assist with preparation for Gunnell deposition	2.60 320.00/hr	832.00
	JK	Prepare for Deposition re: Heather Gunnell w/ K.B. Kramer: review of outline and exhibits.	2.70 100.00/hr	270.00
	JK	Prepare exhibits and review outline for deposition re: Heather Gunnell; phone call w/ K. Burghardt Kramer.	4.40 100.00/hr	440.00
	JK	Conf. w/ K. B. Kramer re: Heather Gunnell deposition preparation	0.30 100.00/hr	30.00
8/2/2019	KBK	Prepare for Heather Gunnell deposition	2.60 175.00/hr	455.00
	KBK	Take deposition of Heather Gunnell; meetings with Geoffrey Vitt and Sarah Nunan during deposition breaks regarding strategy	5.90 175.00/hr	1,032.50
	KBK	Meetings with Sarah Nunan, Geoffrey Vitt and Julia Korkus regarding depositions and strategy	2.10 175.00/hr	367.50
	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	SN	Conf. with KBK and GJV preparing for Gunnell deposition	2.10 80.00/hr	168.00
	SN	Attended deposition of Heather Gunnell and conf with GJV, KBK, and client	6.40 80.00/hr	512.00
	GJV	Prepare for Heather Gunnell deposition	1.10 320.00/hr	352.00
	GJV	Heather Gunnell deposition and conf. K. Kramer	7.80 320.00/hr	2,496.00
	GJV	Review rule 30(b)(6) issues	0.40 320.00/hr	128.00
	JK	Confs. w/ G. Vitt, S. Nunan, K. Burghardt Kramer re: deposition strategy and discovery documents	1.70 100.00/hr	170.00
	JK	Deposition document preparation: E. Todd, L. DeMars.	3.10 100.00/hr	310.00
8/3/2019	GJV	Letter to Schroeder and Joseph re: Risk Management	0.30 320.00/hr	96.00
	GJV	E-mails with D. Schroeder	0.20 320.00/hr	64.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
8/4/2019	KBK Exchange emails with Misty Porter regarding depositions	0.20 175.00/hr	35.00
	SN Conf with GJV RE upcoming witnesses and strategy	0.20 80.00/hr	16.00
	GJV E-mail K. Kramer re: discovery dispute	0.20 320.00/hr	64.00
	GJV E-mails w/ K. Kramer and draft letter to D. Schroeder	0.30 320.00/hr	96.00
8/5/2019	KBK Receive and review email from Geoffrey Vitt regarding discovery issues; telephone conference with Geoffrey Vitt	0.50 175.00/hr	87.50
	KBK Telephone conference with Bob Bancroft and Geoffrey Vitt; email to Misty Porter regarding economic damages	0.50 175.00/hr	87.50
	KBK Exchange emails with Geoffrey Vitt regarding additional documents requested from Heather Gunnell; call to Jessica Joseph and leave message; exchange emails with Misty Porter regarding damages	0.70 175.00/hr	122.50
	KBK Review draft letter to opposing counsel regarding deposition of Karen Boedkter; email to Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK Exchange emails with Geoffrey Vitt regarding witness interviews	0.10 175.00/hr	17.50
	SN Conf with GJV RE damages, expert and strategy	0.50 80.00/hr	40.00
	GJV Outline for S. Parent conference and emails M. Porter and K. Kramer	0.30 320.00/hr	96.00
	GJV Review damages issue and conf. Call Bancroft and K. Kramer	1.60 320.00/hr	512.00
	GJV Conf. with S. Nunan re: damages and experts	0.50 320.00/hr	160.00
8/6/2019	KBK Exchange emails with Geoffrey Vitt and Jessica Joseph regarding depositions and subpoena on Leslie DeMars	0.10 175.00/hr	17.50
	KBK Exchange emails with Geoffrey Vitt regarding Risk Management; exchange emails with Geoffrey Vitt and Misty Porter regarding mediation	0.10 175.00/hr	17.50
	KBK Prepare for continued deposition of Beth Todd	0.10 175.00/hr	17.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/6/2019	KBK Exchange emails with Geoffrey Vitt, Liz Bower regarding mediation; receive and review correspondence from Don Schroeder regarding subpoena response from Leslie DeMars	0.20 175.00/hr	35.00
	KBK Prepare questions for telephone conference with Emily Baker	0.10 175.00/hr	17.50
	GJV Review DH response re; DeMars' subpoena and emails K. Kramer	0.30 320.00/hr	96.00
	GJV Review J. Joseph emails and email to D. Schroeder	0.30 320.00/hr	96.00
8/7/2019	KBK Prepare for telephone conference with Emily Baker; telephone conference with Emily Baker	1.70 175.00/hr	297.50
	KBK Exchange emails with Geoffrey Vitt regarding deposition of Leslie DeMars	0.10 175.00/hr	17.50
	KBK Prepare for telephone conference with Emily Baker; telephone conference with Emily Baker	1.30 175.00/hr	227.50
	KBK Receive and review 2018 financial information from Misty Porter for updating expert report	0.10 175.00/hr	17.50
	KBK Prepare for deposition of Kim Fleury; telephone conference with Geoffrey Vitt regarding depositions	3.90 175.00/hr	682.50
	KBK Receive and review court decision on in camera review of second round of documents withheld as attorney-client privileged	0.20 175.00/hr	35.00
	KBK Exchange emails with Geoffrey Vitt regarding discovery; exchange emails with Jessica Joseph regarding depositions and document production	0.60 175.00/hr	105.00
	GJV E-mail with K. Kramer and D. Schroeder re: DeMars and email re: subpoena	0.60 320.00/hr	192.00
	GJV Conference with Misty Porter and Tom Porter	0.60 320.00/hr	NO CHARGE
	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV Outlines for deposition review and email K. Kramer re; outline and motions.	0.50 320.00/hr	160.00
	GJV Review outline K. Fleury deposition and several emails with K. Kramer	0.90 320.00/hr	288.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
8/8/2019 KBK Travel to Norwich	1.50 175.00/hr	NO CHARGE
KBK Meeting with Geoffrey Vitt regarding deposition of Beth Todd	0.20 175.00/hr	35.00
KBK Revise deposition outline for Beth Todd; prepare for deposition of Beth Todd	0.80 175.00/hr	140.00
KBK Deposition of Beth Todd	1.80 175.00/hr	315.00
KBK Deposition of Kim Fleury	3.40 175.00/hr	595.00
KBK Email to Don Schroeder and Jessica Joseph regarding verification of interrogatories	0.80 175.00/hr	140.00
KBK E-mail to Misty Porter regarding damages and other issues	0.20 175.00/hr	35.00
KBK Return ravel from Norwich	1.50 175.00/hr	NO CHARGE
GJV Deposition of B. Todd and K. Fleury and conf. M. Porter and K. Kramer	6.50 320.00/hr	2,080.00
GJV E-mail K. Kramer	0.20 320.00/hr	64.00
8/9/2019 KBK Receive and review emails from Misty Porter regarding damages and other issues; receive and review revised deposition notices from Liz Bower	0.30 175.00/hr	52.50
KBK Prepare for meet-and-confer call with Don Schroeder and Jessica Joseph; meet and confer telephone conference with Don Schroeder, Jessica Joseph, and Geoffrey Vitt regarding Risk Management deposition, subpoena of Leslie DeMars, and other issues; telephone conference with Geoffrey Vitt regarding discovery issues	0.80 175.00/hr	140.00
SN Conf. With GJV RE B. Todd deposition and J. Fleury Deposition	0.20 80.00/hr	16.00
GJV Conference call D. Schroeder, J. Joseph and K. Kramer	0.50 320.00/hr	160.00
GJV E-mails and letters D. Schroeder and email K. Kramer	0.30 320.00/hr	96.00
GJV Conf. with S. Nunan re. depositions	0.20 320.00/hr	64.00

Misty Porter

			<u>Hrs/Rate</u>	<u>Amount</u>
8/12/2019	KBK	Receive and review correspondence from Don Schroeder regarding subpoena to Leslie DeMars; receive and review correspondence from Don Schroeder regarding Rule 30(b)(6) deposition of risk management	0.10 175.00/hr	17.50
	KBK	Organize notes from depositions of Beth Todd and Kim Fleury	0.10 175.00/hr	NO CHARGE
	KBK	Prepare memorandum to file regarding telephone conference with Emily Baker; circulate memorandum to Geoffrey Vitt, Julia Korkus and Sarah Nunan	2.00 175.00/hr	350.00
8/13/2019	KBK	Receive and review correspondence from Don Schroeder to Judge Crawford regarding production of privileged documents	0.30 175.00/hr	52.50
	KBK	Exchange emails with Misty Porter regarding medical records	0.10 175.00/hr	17.50
	JK	Receive & review KBK memo from witness interview w/ E. Baker; review revised privilege log; Rule 30(b)(6) Notice and deposition corr.	0.70 100.00/hr	70.00
	JK	Emails w/ K. Burghardt Kramer & B. Bancroft re: medical and financial records; assemble information.	0.70 100.00/hr	70.00
	JK	Receive and review email from J. Joseph w/ additional production of documents per court order; update log.	0.20 100.00/hr	20.00
	JK	Emails w/ G. Vitt on response issues w/ Defendants; review K. Boedtke depo transcript	0.50 100.00/hr	50.00
	JK	Receive and review correspondence from D. Schroeder on Order On In Camera Review and request for work product status.	0.40 100.00/hr	40.00
	JK	Review Herrick and Merrens deposition transcripts and final exhibits.	3.80 100.00/hr	380.00
8/14/2019	GJV	E-mails with K. Kramer and review testimony of Boedtke	0.20 320.00/hr	64.00
	KBK	Exchange emails with Geoffrey Vitt regarding Risk Management deposition; email to Misty Porter regarding Risk Management	0.30 175.00/hr	52.50
	KBK	Receive and review email from Jessica Joseph regarding production of additional documents	0.10 175.00/hr	17.50
	KBK	Receive and review email from Misty Porter regarding Risk Management; exchange emails with Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00
	KBK	Prepare letter to Judge Crawford regarding "Document 80" withheld on attorney work product grounds	0.70 175.00/hr	122.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/14/2019	KBK	Receive and review additional production of documents from Jessica Joseph; exchange emails with Geoffrey Vitt regarding additional production	0.30 175.00/hr 52.50
	JK	File transfer of 7/17/18 Hearing audio file.; Receive and review email from J. Joseph w/ additional doc. production per court order; update log.	0.50 100.00/hr 50.00
	JK	Review Merrens, Todd V. 1, Gunnell V. 1, & Boedtker deposition transcripts and final exhibits.	5.50 100.00/hr 550.00
	JK	Listen to audio of hearing on motions while reviewing transcripts.	0.10 100.00/hr 10.00
8/15/2019	KBK	Draft and finalize letter to Judge Crawford regarding Document 80 (Boedtker memo); email draft letter to Geoffrey Vitt for review	0.40 175.00/hr 70.00
	KBK	Exchange emails with Geoffrey Vitt regarding letter to Judge Crawford	0.30 175.00/hr 52.50
	KBK	Receive and review memorandum from Don Schroeder regarding interrogatories	0.10 175.00/hr 17.50
	JK	Deposition preparation DeMars and Risk Management: search and document review and copying set for review.	5.80 100.00/hr 580.00
8/16/2019	KBK	Exchange emails with Jessica Joseph regarding Risk Management deposition	0.10 175.00/hr 17.50
	KBK	Exchange emails with Geoffrey Vitt regarding depositions; revise deposition notice for Rule 30(b)(6) Risk Management deposition	0.30 175.00/hr 52.50
	JK	Deposition preparation DeMars: search and document review and copying set for review.	5.70 100.00/hr 570.00
8/19/2019	KBK	Receive and review email from Misty Porter; email to Misty Porter; receive and review second amended deposition notice for Risk Management Rule 30(b)(6) deposition	0.30 175.00/hr 52.50
	JK	Review E. Todd and K. Fleury deposition transcripts.	1.50 100.00/hr 150.00
	JK	Search and review production documents per Dr. Padin deposition and issues of concern/complaint re: Dr. Seifer and/or Dr. Hsu.	4.70 100.00/hr 470.00
8/20/2019	JK	Search and review production documents per Dr. Padin deposition and issues of concern/complaint re: Dr. Seifer and/or Dr. Hsu.	6.00 100.00/hr 600.00
8/21/2019	KBK	Receive and review letter from Don Schroeder regarding deposition of Leslie DeMars; exchange emails with Geoffrey Vitt regarding deposition of Leslie DeMars	0.30 175.00/hr 52.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
8/21/2019	SN	Conf with GJV RE second 30 (b)(6) deposition strategy	0.30 80.00/hr	24.00
	SN	Conf with JK RE. documents needed approach to 30(b)(6)	0.40 80.00/hr	32.00
	SN	Follow up document review with JK	0.20 80.00/hr	16.00
	GJV	Review D.Schroeder letter and draft reply	0.30 320.00/hr	96.00
	GJV	Outline for M. King deposition	0.90 320.00/hr	288.00
	JK	Receive and review email from J. Joseph w/ seventeenth production of documents. Review documents.	0.80 100.00/hr	80.00
	JK	Search and Review production documents per reports, logs of patient concern/complaint re: REI; Maria Padin deposition preparation.	5.80 100.00/hr	580.00
8/22/2019	GJV	Review Quantros report issue	0.20 320.00/hr	64.00
	GJV	Review DeMars subpoena and letters/emails and prepare letter to D. Schroeder	0.80 320.00/hr	256.00
	GJV	Prepare for Risk Management deposition	1.50 320.00/hr	480.00
	JK	Email, meeting, and review w/ S Nunan on quantros report document from Def.	0.50 100.00/hr	50.00
	JK	Deposition preparation DeMars: search and document review and copying set for review.	0.10 100.00/hr	10.00
	JK	Prepare copy of key docs for mediation preparation.	4.00 100.00/hr	400.00
	SN	Review quantros reports	0.30 80.00/hr	24.00
8/23/2019	SM	Research re: objection to location of deposition	0.10 200.00/hr	20.00
	SM	Emails w/ GJV re: DH interrogatory answers	0.30 200.00/hr	60.00
	SN	Preparing for Michelle King Deposition	0.30 80.00/hr	24.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
8/23/2019	SN	Reviewing new documents produced by DHMC and conferencing with GJV	1.50 80.00/hr 120.00
	SN	Reviewing documents RE M. King and client; also reviewing transcript of Karen Boedtger in preparing for deposition of M.King	1.30 80.00/hr 104.00
	GJV	Review prod #17 from DH and prepare for King deposition	0.80 320.00/hr 256.00
	GJV	Letter to D. Schroeder	0.20 320.00/hr 64.00
	GJV	Prepare for deposition	2.30 320.00/hr 736.00
	GJV	Prepare draft supplemental requests	0.50 320.00/hr 160.00
	JK	Search and review documents re: Michele King/Risk Management	3.40 100.00/hr 340.00
	JK	Receive and review email from G. Vitt on discovery requests; review prior requests and prepare list of additional documents; conf. w/ G. Vitt.	2.30 100.00/hr 230.00
8/24/2019	KBK	Receive and review additional production of documents from Dartmouth-Hitchcock	0.20 175.00/hr 35.00
	KBK	Receive and review email from Jessica Joseph regarding deposition of Joanne Conroy; receive and review letter from Geoffrey Vitt to Don Schroeder and Jessica Joseph regarding deposition of Leslie DeMars	0.10 175.00/hr 17.50
	KBK	Research regarding deposition of Joanne Conroy	0.30 175.00/hr 52.50
	KBK	Review the seventeenth production of documents from Dartmouth-Hitchcock	0.50 175.00/hr 87.50
	KBK	Telephone conference with Geoffrey Vitt regarding pending issues	0.10 175.00/hr 17.50
	KBK	Exchange emails with Misty Porter regarding next steps	0.40 175.00/hr 70.00
	SN	Conf with GJV RE needed from 30 (b) (6)	0.30 80.00/hr 24.00
	SN	Reviewed documents from DHMC in preparing for 30(b)(6)	1.40 80.00/hr 112.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2019	SN Conf with GJV to review questions and strategy	0.40 80.00/hr	32.00
	SN Reviewed Boedtke deposition to prep for King's deposition	0.60 80.00/hr	48.00
	GJV Prepare for Risk Management deposition	1.70 320.00/hr	544.00
	GJV T/c K. Kramer re: Risk Management deposition, H. Gunnell deposition, 17th production, other pending depositions, and Conroy deposition	0.60 320.00/hr	192.00
	GJV Letter to D. Schroeder re: delays in defendants' production	0.70 320.00/hr	224.00
	GJV Review documents for Risk Management deposition	0.50 320.00/hr	160.00
	GJV E-mails with M. Porter re: status and witnesses	0.30 320.00/hr	96.00
	GJV Supplemental discovery to DH	0.80 320.00/hr	256.00
	GJV E-mails with M. Porter	0.30 320.00/hr	96.00
	GJV Memo on trial witnesses	0.50 320.00/hr	160.00
	JK Receive and review email from G. Vitt on production of document issues from Defendants.	0.20 100.00/hr	20.00
8/25/2019	KBK Review and revise letter to Don Schroeder and Jessica Joseph regarding seventeenth production of documents	0.40 175.00/hr	70.00
	KBK Prepare for Heather Gunnell deposition	3.20 175.00/hr	560.00
	KBK Telephone conference with Geoffrey Vitt regarding Heather Gunnell deposition	0.20 175.00/hr	35.00
	SN Reviewed letter RE Defendant's behavior and provided feedback by email	0.30 80.00/hr	24.00
	GJV E-mail S. Merlo re: interrog. Answers	0.10 320.00/hr	32.00
	GJV Review draft letter to D. Schroeder/Joseph re 17th production and review K. Kramer revisions; email K. Kramer and Email S Nunan	0.40 320.00/hr	128.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/25/2019	GJV	Revisions to supplemental discovery requests	0.30 320.00/hr	96.00
	GJV	Review K. Kramer outline for Gunnell depo and provide comments	1.10 320.00/hr	352.00
	GJV	Review DH document production issues and prepare requests	0.40 320.00/hr	128.00
	GJV	Outline for M. King deposition	0.70 320.00/hr	224.00
8/26/2019	SM	Research re: plaintiff's right to select location of corporate officer deposition; emails with GJV	3.10 200.00/hr	620.00
	SM	Research re: validity of paralegal signature/verification of interrogatories; emails with GJV	2.20 200.00/hr	440.00
	KBK	Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Meeting with Geoffrey Vitt and Sarah Nunan regarding depositions and other issues	1.30 175.00/hr	227.50
	KBK	Prepare for Heather Gunnell deposition	1.70 175.00/hr	297.50
	KBK	Take deposition of Heather Gunnell	3.50 175.00/hr	612.50
	KBK	Meeting with Geoffrey Vitt and Misty Porter regarding expert report and other issues	0.50 175.00/hr	87.50
	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	SN	Conf. with GJV to review Michele King outline	0.30 80.00/hr	24.00
	SN	Prepare for Michele King deposition	1.40 80.00/hr	112.00
	SN	Conf with KBK and GJV to go over how Gunnell fits into big picture and discuss questions regarding new documents	1.30 80.00/hr	104.00
	SN	Attend second deposition of Heather Gunnell	3.50 80.00/hr	280.00
	SN	Reviewing and drafting questions RE Siefer complaint documents for Michelle King deposition	2.10 80.00/hr	168.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/26/2019	GJV	Review outline for Risk Management and conf. S. Nunan	0.60 320.00/hr	192.00
	GJV	Review Gunnell deposition outline; work on outline for Conroy deposition	4.10 320.00/hr	1,312.00
	GJV	Prepare for M. King deposition	1.30 320.00/hr	416.00
	JK	Meeting and emails w/ S. Nunan re: patient complaint files from Defendants.	0.20 100.00/hr	20.00
	JK	Review and receive email from G. Vitt. Email summary on electronic system reports & document production by Defendants	0.30 100.00/hr	30.00
	JK	Receive and review Risk Management email from Dr. Blanchette Porter	0.10 100.00/hr	10.00
	JK	Deposition preparation, document review re: Michele King; copy set for review.	4.80 100.00/hr	480.00
	JK	Receive and review email from G. Vitt on trial witnesses.	0.30 100.00/hr	30.00
	GJV	Conf. with K. Kramer and S. Nunan re: Gunnell and trial issues	1.30 320.00/hr	416.00
8/27/2019	SM	Research re: validity of paralegal verification of interrogatory answers	3.90 200.00/hr	780.00
	KBK	Receive and review email from Misty Porter regarding depositions; email to Jessica Joseph regarding deposition of Joanne Conroy	0.30 175.00/hr	52.50
	KBK	Telephone conference with Geoffrey Vitt regarding risk management deposition and other issues	0.30 175.00/hr	52.50
	KBK	Receive and review research from Sarah Merlo regarding interrogatory verification issues; exchange emails with Geoffrey Vitt regarding same	0.40 175.00/hr	70.00
	KBK	Receive and review email from Misty Porter regarding OB/GYN Department	0.10 175.00/hr	17.50
	SN	Conf with GJV preparing for deposition of Michelle King	1.10 80.00/hr	88.00
	SN	Prepared exhibits for Michele King	0.90 80.00/hr	72.00
	SN	Attended deposition of Michele King	3.90 80.00/hr	312.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/27/2019	SN	Conf with GJV RE outline of topics for Leslie DeMars deposition	1.90 80.00/hr	152.00
	JK	Update log of production received from Defendants	0.40 100.00/hr	40.00
	JK	Deposition preparation: search and review documents re: Joanne Conroy and Leslie DeMars	6.20 100.00/hr	620.00
	GJV	Prepare for deposition of Risk Management	1.60 320.00/hr	512.00
	GJV	T/c K. Kramer re: Risk Management deposition, Padin, and discovery to DH	0.30 320.00/hr	96.00
	GJV	Outline of proof and Conroy deposition	0.90 320.00/hr	288.00
	GJV	Email M. Porter re: King testimony and proof	0.20 320.00/hr	64.00
	GJV	Review emails and email K. Kramer and S. Merlo re: interrogatories answers and burden of proof	0.40 320.00/hr	128.00
	GJV	Deposition of Risk Management	3.90 320.00/hr	1,248.00
8/28/2019	SM	Review and respond to KBK email re: knowledge requirements of person verifying interrogatory answers and remedy for improper verification	1.10 200.00/hr	220.00
	KBK	Receive and review emails from Sarah Merlo and Geoffrey Vitt regarding interrogatory verification	0.10 175.00/hr	17.50
	KBK	Receive and review email from Geoffrey Vitt regarding Joanne Conroy deposition	0.10 175.00/hr	17.50
	KBK	Receive and review email from Jessica Joseph regarding deposition of Leslie DeMars; exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	JK	Mediation preparation per G. Vitt email - quotes and key docs; issues of concern/complaint re: Dr. Seifer and/or Dr. Hsu.	4.50 100.00/hr	450.00
	GJV	E-mails with S. Merlo and K. Kramer re: research on interrogatory answers	0.30 320.00/hr	96.00
	GJV	E-mail S. Parent and P. Manganiello	0.20 320.00/hr	64.00
	GJV	E-mail M. Porter re: tubal patency and consent	0.20 320.00/hr	64.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2019	GJV	E-mail J. Joseph and K. Kramer and M. Porter re: DeMars deposition	0.30 320.00/hr	96.00
	GJV	Supplemental discovery to DH	0.30 320.00/hr	96.00
	GJV	Outline for DeMars	0.40 320.00/hr	128.00
	GJV	Emails re: depositions and witnesses	0.30 320.00/hr	96.00
8/29/2019	SM	Review and respond to GJV email re: availability of fees/sanctions for discovery deficiencies; research re: same	0.70 200.00/hr	140.00
	SM	Research re: causation standard under ADA; email to GJV re: same	0.90 200.00/hr	180.00
	KBK	Receive and review email from Geoffrey Vitt to Jessica Joseph regarding deposition of Leslie DeMars	0.10 175.00/hr	17.50
	KBK	Exchange emails with Jessica Joseph and Geoffrey Vitt regarding mediation; telephone conference with Geoffrey Vitt regarding mediation and other issues	0.20 175.00/hr	35.00
	KBK	Draft 30(b)(6) deposition notice regarding interrogatory 8	0.20 175.00/hr	35.00
	JK	Mediation preparation per G. Vitt email - quotes and key docs; issues of concern/complaint re: Dr. Seifer and/or Dr. Hsu.	5.70 100.00/hr	570.00
	GJV	Telephone Conversation with mediator and prepare summary	0.30 320.00/hr	96.00
8/30/2019	KBK	Receive and review emails from Jessica Joseph and Geoffrey Vitt regarding mediation	0.10 175.00/hr	17.50
	JK	Search and review documents for Dr. Porter return to work and HR documents.	2.30 100.00/hr	230.00
	GJV	Email M. Porter re: tubal patency issue	0.20 320.00/hr	64.00
	GJV	Review supplemental requests and email K. Kramer re: requests and interrogatories	0.30 320.00/hr	96.00
	GJV	Email J. Joseph re: mediation	0.10 320.00/hr	32.00
	GJV	Supplemental discovery to DH	1.50 320.00/hr	480.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2019	GJV Review additional requests and interrogatories and review defendants earlier answers and responses	1.60 320.00/hr	512.00
	GJV Prepare outline for witness interviews	0.80 320.00/hr	256.00
	GJV Review summaries for 2 meetings and prepare outline for Hsu and Seifer issues	0.60 320.00/hr	192.00
	GJV Email K. Kramer re: discovery issues	0.20 320.00/hr	64.00
	GJV Review DH discovery to M. Porter and consider responses	0.30 320.00/hr	96.00
	GJV Outline for Conroy and Padin depositions	0.60 320.00/hr	192.00
	For professional services rendered	268.40	\$45,385.50
	Additional Charges :		
7/25/2019	North Country Reporters Deposition Herrick		754.75
7/30/2019	Verbatim Reporters: Merrens Transcript of Deposition		1,181.40
8/2/2019	Deposition Costs for: Verbatim Reporters		923.75
8/5/2019	copy of Transcript		31.00
	Conference Call		4.14
8/7/2019	Witness fee: Leslie DeMars		43.25
8/8/2019	Deposition Costs for: North Country Court Reporters		805.65
8/14/2019	Deposition Costs for: Service Fee for deposition notice		96.95
8/23/2019	Electronic research charges.		15.35
8/26/2019	Electronic research charges.		170.06
8/27/2019	Electronic research charges.		26.22
8/28/2019	Electronic research charges.		6.19
8/29/2019	Electronic research charges.		40.06
	Total costs		\$4,098.77

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	<u>Amount</u>
Total amount of this bill	\$49,484.27
Previous balance	\$101,286.13
8/20/2019 Payment - thank you	(\$35,000.00)
Total payments and adjustments	(\$35,000.00)
Balance due	<u>\$115,770.40</u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	67.00	320.00	\$21,440.00
Julia Korkus	90.20	100.00	\$9,020.00
Katherine B. Kramer	56.10	175.00	\$9,817.50
Sarah Nunan	33.10	80.00	\$2,648.00
Sarah Merlo	12.30	200.00	\$2,460.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

October 8, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13871

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
9/1/2019	GJV	Revise draft discovery to defendants	1.10 320.00/hr	352.00
	GJV	Outline for interviews with technicians and nurses	0.60 320.00/hr	192.00
	GJV	S. Parent outline	0.30 320.00/hr	96.00
9/2/2019	GJV	Outline for J. Conroy, email S. Nunan and J. Korkus re: Conroy exhibits	0.40 320.00/hr	128.00
	GJV	T/c S. Nunan and review draft requests and interrogatories and email S. Nunan and J. Korkus re: requests and interrogatories	0.50 320.00/hr	160.00
	GJV	Outline for meeting w/ S. Parent and email S. Nunan re: Parent	0.70 320.00/hr	224.00
	GJV	E-mail S. Nunan and review draft memorandum	0.20 320.00/hr	64.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery requests; review and revise draft of additional discovery requests to Dartmouth-Hitchcock	0.30 175.00/hr	52.50
	SN	T/c G. Vitt and review email	0.30 80.00/hr	24.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/3/2019	GJV	Review S. Parent outline	0.20 320.00/hr	64.00
	GJV	Conference with S. Parent	1.70 320.00/hr	544.00
	GJV	Review draft requests and interrogatories and conf. call K. Kramer	0.80 320.00/hr	256.00
	SN	Conf. With GJV preparing for Sharon Parent	0.30 80.00/hr	24.00
	SN	Meeting with GJV and Sharon Parent	1.70 80.00/hr	136.00
	SN	Conf. Call with KBK, GJV and JK RE final discovery requests	0.40 80.00/hr	32.00
	KBK	Revise third set of discovery requests to Dartmouth-Hitchcock; email to Geoffrey Vitt with requests	0.70 175.00/hr	122.50
	KBK	Telephone conference with Geoffrey Vitt, Sarah Nunan, and Julia Korkus regarding discovery requests	0.50 175.00/hr	87.50
	KBK	Telephone conference with Geoffrey Vitt regarding discovery requests and strategy	0.30 175.00/hr	52.50
	KBK	Two telephone conferences with Julia Korkus regarding fourth set of requests to produce	0.80 175.00/hr	140.00
	KBK	Revise and finalize fourth set of discovery requests to defendants	0.20 175.00/hr	35.00
	JK	Conf. w/ G. Vitt, S. Nunan, K. Burghardt Kramer re: discovery requests to D-H; email comments and edits to G. Vitt.	0.70 100.00/hr	70.00
	JK	Prepare, edit, review drafts of plaintiff's 4th set of discovery request to D-H; emails and telephone confs. w/ K. Burghardt Kramer on same; filing and correspondence to D-H counsel.	3.80 100.00/hr	380.00
9/4/2019	GJV	Research re: disability claim	0.20 320.00/hr	64.00
	SM	Email to GJV re: causation standard	0.10 200.00/hr	20.00
	SM	Research re: standard of causation for Section 504 claims	0.80 200.00/hr	160.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/4/2019	KBK Receive and review proposed amended discovery schedule from Jessica Joseph; email to Jessica Joseph confirming proposed amended discovery schedule	0.10 175.00/hr	17.50
	JK Phone call and email inquiries w/ court clerk and court reporter per G. Vitt request re: transcript copy of motion to quash	0.40 100.00/hr	40.00
	JK Receive and review H. Gunnell v. 2 and M. King deposition transcript	2.70 100.00/hr	270.00
9/5/2019	GJV E-mails with G. Clayton and K. Kramer	0.20 320.00/hr	64.00
	GJV T/c K. Kramer re: mediation, risk management, new discovery, and Conroy depo	0.30 320.00/hr	96.00
	GJV Draft e-mail re: mediation and discovery	0.20 320.00/hr	64.00
	GJV Review draft 30(b)(6) notice	0.20 320.00/hr	64.00
	GJV Review email and call Dr. Manganiello	0.10 320.00/hr	32.00
	GJV Review memorandum re: S. Parent	0.40 320.00/hr	128.00
	SN Drafting Sharon Parent Memo	2.80 80.00/hr	224.00
	SN Revising memo	1.20 80.00/hr	96.00
	KBK Telephone conference with Geoffrey Vitt regarding mediation and other issues	0.20 175.00/hr	35.00
	KBK Revise 30(b)(6) deposition notice regarding interrogatory #8	0.50 175.00/hr	87.50
	KBK Prepare list of questions for Julia MacCallum	0.70 175.00/hr	122.50
	KBK Exchange emails with Geoffrey Vitt regarding 30(b)(6) deposition notice	0.20 175.00/hr	35.00
	KBK Draft motion for sanctions regarding discovery related to DeMars as chair (no charge)	1.30 175.00/hr	NO CHARGE
9/6/2019	GJV E-mail K. Kramer re: depositions	0.10 320.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/6/2019	GJV	Review documents for J. Conroy deposition	1.80 320.00/hr	576.00
	SN	Follow up revisions per GJV input	0.30 80.00/hr	24.00
	KBK	Telephone conference with Julia MacCallum	1.50 175.00/hr	262.50
	KBK	Email to Geoffrey Vitt and Misty Porter regarding Julia MacCallum; exchange emails with Jessica Joseph regarding deposition of Bob Bancroft; email to Bob Bancroft regarding deposition	0.10 175.00/hr	17.50
	JK	Conf. w/ S. Nunan, receive and review memo on witness mtg. w/ Sharon Parent	0.50 100.00/hr	50.00
9/7/2019	GJV	Emails with M. Porter re: status and depositions	0.30 320.00/hr	96.00
9/8/2019	SN	Conf. With GJV on Conroy deposition outline	0.30 80.00/hr	24.00
9/9/2019	GJV	T/c K. Kramer and S. Nunan re: interviews with witnesses, discovery, affidavits, and general status	1.00 320.00/hr	320.00
	GJV	Review 18th production from D-H	0.30 320.00/hr	96.00
	GJV	Conf. S. Nunan re: Conroy deposition	0.50 320.00/hr	160.00
	SN	Conf. Call with GJV and KBK RE witnesses left	1.00 80.00/hr	80.00
	KBK	Exchange emails with Misty Porter and Geoffrey Vitt regarding deposition of Joanne Conroy	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt and Sarah Nunan regarding depositions	0.10 175.00/hr	17.50
	KBK	Receive and review emails from Geoffrey Vitt and Misty Porter regarding mediation	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt and Sarah Nunan regarding depositions	1.00 175.00/hr	175.00
	KBK	Receive and review correspondence from Geoffrey Vitt to Don Schroeder and Jessica Joseph regarding deposition of Leslie DeMars	0.10 175.00/hr	17.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
9/9/2019	KBK	Receive and review eighteenth production of documents from Dartmouth-Hitchcock	0.30 175.00/hr	52.50
	JK	Document review and preparation re: disability claims	2.70 100.00/hr	270.00
9/10/2019	GJV	Review J. Joseph email and letter re: additional document production	0.20 320.00/hr	64.00
	GJV	Review J. Joseph letter	0.10 320.00/hr	32.00
	JK	Receive and review email from J. Joseph w/ Prod 18 enclosure. Discuss production and issues w/ G. Vitt.	1.30 100.00/hr	130.00
9/11/2019	KBK	Telephone conference with Geoffrey Vitt regarding deposition of Joanne Conroy	0.10 175.00/hr	17.50
	JK	Prepare Padin document set for K. Burghardt Kramer review - deposition preparation	2.70 100.00/hr	270.00
	JK	Deposition preparation Conroy	1.70 100.00/hr	170.00
9/12/2019	GJV	T/c Paul Manganjiello	0.20 320.00/hr	64.00
	GJV	J. Conroy deposition preparation	1.10 320.00/hr	352.00
	SN	Drafting Conroy questions for deposition	0.40 80.00/hr	32.00
	KBK	Email to Jessica Joseph regarding Rule 30(b)(6) deposition notice	0.10 175.00/hr	17.50
	KBK	Exchange emails with Don Schroeder regarding Rule 30(b)(6) deposition notice	0.10 175.00/hr	17.50
	KBK	Receive and review letter from Jessica Joseph regarding document custodians	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt regarding informal meetings with witnesses	0.20 175.00/hr	35.00
	JK	Prepare Padin document set for K. Burghardt Kramer review - deposition preparation	3.40 100.00/hr	340.00
9/13/2019	GJV	T/c K. Kramer re: deposition preparation issues	0.30 320.00/hr	96.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/13/2019	GJV	Prepare for J. Conroy deposition	1.90 320.00/hr	608.00
	SN	Drafting Conroy questions	2.20 80.00/hr	176.00
	SN	Conf with GJV on Conroy outline	0.40 80.00/hr	32.00
	SN	Reviewed documents and conferenced with JK	1.10 80.00/hr	88.00
	SN	Conf. With GJV and Paul Manganiello	0.70 80.00/hr	56.00
	KBK	Telephone conference with Geoffrey Vitt regarding Joanne Conroy deposition	0.20 175.00/hr	35.00
	JK	Phone call w/ B. Bancroft re: expert report revisions, assumptions, and timing; review tax and compensation per B. Bancroft questions	0.80 100.00/hr	80.00
	JK	Document review and preparation re: disability claims	2.20 100.00/hr	220.00
	JK	Deposition preparation, documents re: Dr. Conroy	1.30 100.00/hr	130.00
9/14/2019	GJV	Conroy deposition outline	2.70 320.00/hr	864.00
9/15/2019	GJV	Preparation for Conroy and Demars depositions	4.60 320.00/hr	1,472.00
	SN	Reviewing documents RE post closure for Conroy deposition	1.40 80.00/hr	112.00
	SN	Review questions and conference with GJV RE Conroy deposition	0.90 80.00/hr	72.00
	SN	Pulling documents for deposition	0.20 80.00/hr	16.00
9/16/2019	GJV	Outline for Conroy and outline for mediation	0.30 320.00/hr	96.00
	GJV	T/c K. Kramer re: deposition, mediation and pending motion	0.40 320.00/hr	128.00
	GJV	Work on Conroy and DeMars outlines	2.40 320.00/hr	768.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/16/2019	GJV	Prepare for Conroy and outline for DeMars depositions	2.70 320.00/hr	864.00
	SN	Conf with GJV and review questions and documents for Conroy deposition	2.80 80.00/hr	224.00
	KBK	Receive and review emails from Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK	Receive and review email from Cathy Conte regarding mediation; email to Don Schroeder and Jessica Joseph regarding mediation	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt regarding discovery issues	0.40 175.00/hr	70.00
	KBK	Exchange emails with Don Schroeder regarding deposition of Leslie DeMars and mediation	0.10 175.00/hr	17.50
	JK	Email and phone call w/ B. Bancroft re: UVM earnings questions; review documents	0.70 100.00/hr	70.00
	JK	Document request and email w/ G. Vitt re: severance agreements and REI division	0.30 100.00/hr	30.00
	JK	Document review and preparation, evidence re: disability claims	3.10 100.00/hr	310.00
9/17/2019	SN	Preparing for Conroy deposition	3.60 80.00/hr	288.00
	KBK	Email to Geoffrey Vitt and Misty Porter regarding deposition of Leslie DeMars	0.20 175.00/hr	35.00
	KBK	Email to Don Schroeder regarding deposition dates	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt regarding deposition dates	0.20 175.00/hr	35.00
	KBK	Call to Don Schroeder and leave message; telephone conference with Don Schroeder regarding deposition of Leslie DeMars	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt regarding Joanne Conroy deposition	0.30 175.00/hr	52.50
	KBK	Exchange emails with Geoffrey Vitt regarding deposition dates; receive and review email from Misty Porter regarding deposition dates	0.20 175.00/hr	35.00
	KBK	Review letter from Jessica Joseph regarding document custodians; email to Misty Porter regarding document custodians	0.40 175.00/hr	70.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/17/2019	KBK Begin reviewing memorandum to file from Sarah Nunan regarding Sharon Parent	0.10 175.00/hr	17.50
	JK Depo preparation Joanne Conroy - requests from GJV - Barry Smith etc.	3.80 100.00/hr	380.00
	JK Email w/ M. Blanchette Porter re: UVM paystubs and questions from B. Bancroft.	0.20 100.00/hr	20.00
9/18/2019	GJV Deposition of J. Conroy and preparation of Conroy and DeMars depositions	7.30 320.00/hr	2,336.00
	SN Conf. With GJV reviewing outline of deposition	1.00 80.00/hr	80.00
	SN Conf. With JK, KBK, and GJV Re outline	1.20 80.00/hr	96.00
	SN Prepared exhibits	1.40 80.00/hr	112.00
	SN Attended deposition of Conroy	3.20 80.00/hr	256.00
	SN Conf with KBK and JK RE Bankroft decisions	1.10 80.00/hr	88.00
	SN Conf. With GJV and KBK RE other depositions	0.30 80.00/hr	24.00
	KBK Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK Meeting with Julia Korkus regarding damages and revision to expert report	0.40 175.00/hr	70.00
	KBK Meeting with Sarah Nunan, Geoffrey Vitt, and Julia Korkus regarding deposition of Joanne Conroy	2.00 175.00/hr	350.00
	KBK Attend deposition of Joanne Conroy	3.50 175.00/hr	612.50
	KBK Meeting with Geoffrey Vitt, Sarah Nunan and Julia Korkus regarding discovery issues	1.50 175.00/hr	262.50
	KBK Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	JK Conf. w/ G. Vitt, K. Burgardt Kramer, S. Nunan re: Conroy depo preparation; claims and damages discussion, B. Bancroft planning.	2.20 100.00/hr	220.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/18/2019	JK	Conf. w/ K. Burghardt Kramer re: revisions to economic assumptions, projections and expert report	0.40 100.00/hr	40.00
	JK	Conf. w/ G. Vitt, S. Nunan, K. Burghardt Kramer re: discovery issues	1.50 100.00/hr	150.00
9/19/2019	GJV	Review outline for DeMars deposition	1.70 320.00/hr	544.00
	KBK	Receive and review email from Misty Porter regarding strategy	0.10 175.00/hr	17.50
	KBK	Prepare memorandum to file regarding interview with Julia MacCallum	0.70 175.00/hr	122.50
	KBK	Review memorandum to file regarding Sharon Parent	0.20 175.00/hr	35.00
	JK	Email set of scanned Padin documents to K. Burghardt Kramer; prepare witness and file memo binder	0.90 100.00/hr	90.00
	JK	Read medical records produced by D-H re: disability claim	3.20 100.00/hr	320.00
9/20/2019	GJV	Memorandum on DeMars deposition	1.80 320.00/hr	576.00
	GJV	Review McCallum memorandum and email	0.70 320.00/hr	224.00
	GJV	T/c K. Kramer re: custodians, medical records, interrogatory answers, DeMars and Padin depositions	0.30 320.00/hr	96.00
	KBK	Prepare list of issues to discuss with Don Schroeder	0.20 175.00/hr	35.00
	KBK	Review list of Dartmouth-Hitchcock document custodians, prepare additional list of needed document custodians and send list to Geoffrey Vitt for review	0.70 175.00/hr	122.50
	KBK	Telephone conference with Geoffrey Vitt regarding discovery	0.20 175.00/hr	35.00
	KBK	Draft, finalize, and circulate memorandum to file regarding Julia MacCallum	2.30 175.00/hr	402.50
	KBK	Exchange emails with Don Schroeder regarding meet-and-confer on discovery issues	0.20 175.00/hr	35.00
	KBK	Receive and review correspondence from Don Schroeder regarding discovery deadlines	0.10 175.00/hr	17.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/20/2019	KBK Exchange emails with Geoffrey Vitt regarding meet-and-confer	0.10 175.00/hr	17.50
	JK Emails and review new medical records from Dr. A. Schwarz office	0.70 100.00/hr	70.00
	JK Receive and review memo on J. MacCallum	0.40 100.00/hr	40.00
9/21/2019	GJV Review memorandum re: meeting with Dr. MacCallum and prepare email re: deposition and trial issues	0.60 320.00/hr	192.00
	KBK Exchange emails with Geoffrey Vitt regarding Julia MacCallum	0.10 175.00/hr	17.50
9/22/2019	GJV Outline for DeMars deposition	1.30 320.00/hr	416.00
9/23/2019	GJV Conf. S Nunan and prepare outline for DeMars	0.60 320.00/hr	192.00
	GJV T/c K. Kramer re: Padin deposition	0.20 320.00/hr	64.00
	GJV Review S. Parent email and prepare response	0.20 320.00/hr	64.00
	GJV Prepare outline for Padin deposition and discovery re: DeMars	1.10 320.00/hr	352.00
	GJV Conf. Call D. Schroeder, K. Kramer, J. Joseph re: rule 30(b)(6), interrogatory, and custodians	0.50 320.00/hr	160.00
	SN Conf with GJV RE Demars outline and memo	0.90 80.00/hr	72.00
	SN Follow up conf with JK RE Demars documents to support questioning on discrimination and disability	0.80 80.00/hr	64.00
	KBK Prepare for Maria Padin deposition	2.90 175.00/hr	507.50
	KBK Telephone conference with Geoffrey Vitt regarding next steps	0.10 175.00/hr	17.50
	KBK Prepare for and attend telephone conference with Don Schroeder, Jessica Joseph and Geoffrey Vitt regarding discovery issues	0.50 175.00/hr	87.50
	KBK Second telephone conference with Geoffrey Vitt	0.10 175.00/hr	17.50



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		<u>Hrs/Rate</u>	<u>Amount</u>
9/23/2019	KBK Email to Don Schroeder and Jessica Joseph regarding fourth set of requests to produce	0.40 175.00/hr	70.00
	KBK Exchange emails with Misty Porter regarding damages	0.10 175.00/hr	17.50
	JK Conf. and email w/ K. Burghart Kramer re: updates and expert report status	0.30 100.00/hr	30.00
	JK Phone call w/ B. Bancroft re: report revisions	0.20 100.00/hr	20.00
	JK Padin deposition preparation and email to K. Burghardt Kramer - additional documents	0.40 100.00/hr	40.00
	JK Reading medical records produced by D-H re: disability claim, evidence	2.80 100.00/hr	280.00
9/24/2019	GJV Review memo on DeMars deposition	0.20 320.00/hr	64.00
	GJV Review J Jseph letter and email; review K. Kramer email and email S. Merlo re: Rule 30(b)(6) issue	0.30 320.00/hr	96.00
	GJV Review J. Joseph email and K. Kramer email re: discovery dispute	0.30 320.00/hr	96.00
	GJV T/c K. Kramer re: motion to compel and custodians	0.20 320.00/hr	64.00
	GJV Conf. S. Nunan re: DeMars deposition	0.30 320.00/hr	96.00
	GJV Review Padin deposition outline and edit	1.20 320.00/hr	384.00
	GJV E-mails with K. Kramer	0.20 320.00/hr	64.00
	SM Research re: refusal to produce 30(b)(6) witness on certain enumerated topics on basis of work product privilege.	3.00 200.00/hr	600.00
	SM Emails re: research needed on work product objections to 30(b)(6) depositions	0.30 200.00/hr	60.00
	SM Draft memo re depositions	3.70 200.00/hr	740.00
	SM Review defendant's objections to 30(b)(6) notice	0.20 200.00/hr	40.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/24/2019	KBK	Receive and review correspondence from Jessica Joseph regarding Rule 30(b)(6) deposition notice; email to Geoffrey Vitt regarding same	0.30 175.00/hr	52.50
	KBK	Prepare for call with Misty Porter	0.20 175.00/hr	35.00
	KBK	Telephone conference with Misty Porter regarding damages	0.60 175.00/hr	105.00
	KBK	Email to Geoffrey Vitt regarding discovery disputes	0.20 175.00/hr	35.00
	KBK	Prepare for deposition of Maria Padin	4.90 175.00/hr	857.50
	KBK	Telephone conference with Geoffrey Vitt	0.40 175.00/hr	70.00
	KBK	Telephone conference with Bob Bancroft	0.10 175.00/hr	17.50
	KBK	Telephone conference with Julia Korkus regarding deposition of Maria Padin	0.20 175.00/hr	35.00
	KBK	Receive and review emails from Geoffrey Vitt and Misty Porter regarding Jill Attaman	0.10 175.00/hr	17.50
	JK	Receive and review motions. Padin outline; conf. w/ K. Burghardt Kramer; prepare exhibits for M. Padin Deposition	3.60 100.00/hr	360.00
	JK	Padin deposition preparation and email to K. Burghardt Kramer - additional document	0.30 100.00/hr	30.00
	JK	Scanning document set re: disability claim, evidence	0.60 100.00/hr	60.00
9/25/2019	SN	Review outline for Padin deposition and conf with KBK	1.10 80.00/hr	88.00
	SN	Attend deposition of Maria Padin	7.10 80.00/hr	568.00
	SN	Post deposition conf on issues with KBK and GJV	0.40 80.00/hr	32.00
	GJV	E-mail D. Schroeder re: DeMars deposition	0.20 320.00/hr	64.00
	GJV	Prepare for and attend M. Padin depositions	8.50 320.00/hr	2,720.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/25/2019	SM Draft memo re: 30(b)(6) deposition	2.20 200.00/hr	440.00
	KBK Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK Prepare for Maria Padin deposition	1.20 175.00/hr	210.00
	KBK Take deposition of Maria Padin, meetings with Geoffrey Vitt and Sarah Nunan regarding deposition and strategy during deposition breaks, telephone conference with Misty Porter regarding deposition during deposition breaks	7.50 175.00/hr	1,312.50
	KBK Meeting with Geoffrey Vitt and Sarah Nunan regarding strategy	0.40 175.00/hr	70.00
	KBK Travel from Norwich	1.50 175.00/hr	NO CHARGE
	JK Prepare draft and documents per plaintiff's response to third request for production from defendants	1.50 100.00/hr	150.00
	JK Scanning medical records produced by D-H document set re: disability claim, evidence	1.40 100.00/hr	140.00
9/26/2019	SN Conf with JK RE Padin depo and follow up RE MBP's comments via email and text	0.40 80.00/hr	32.00
	GJV Review notes of M. Padin deposition	0.20 320.00/hr	64.00
	GJV Outline motion	0.20 320.00/hr	64.00
	GJV E-mail K. Burghardt Kramer re: motion, depo prep, etc .	0.30 320.00/hr	96.00
	GJV E-mail K. Burghardt Kramer re: motion to compel	0.30 320.00/hr	96.00
	GJV DeMars outline	0.70 320.00/hr	224.00
	SM Draft memo re: work product privilege	1.60 200.00/hr	320.00
	SM Research re: work product privilege	2.50 200.00/hr	500.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/26/2019	KBK Telephone conference with Bob Bancroft	0.90 175.00/hr	157.50
	KBK Email to Misty Porter regarding expert report	0.20 175.00/hr	35.00
	KBK Email to Misty Porter regarding deposition of Maria Padin	0.20 175.00/hr	35.00
	KBK Email to Jessica Joseph regarding deposition of Robert Bancroft	0.10 175.00/hr	17.50
	KBK Receive and review emails from Misty Porter	0.10 175.00/hr	17.50
	KBK Emails to Misty Porter regarding damages and discovery issues	0.20 175.00/hr	35.00
	KBK Exchange emails with Geoffrey Vitt regarding depositions	0.10 175.00/hr	17.50
	KBK Exchange emails with Geoffrey Vitt regarding depositions	0.20 175.00/hr	35.00
	KBK Exchange emails with Geoffrey Vitt and Misty Porter regarding strategy and next steps	0.20 175.00/hr	35.00
9/27/2019	SN Conf with GJV RE Demars deposition	0.30 80.00/hr	24.00
	GJV Review Padin deposition questions and DeMars outline	0.30 320.00/hr	96.00
	GJV Memo on Padin testimony	0.30 320.00/hr	96.00
	GJV Memo on DeMars deposition	0.20 320.00/hr	64.00
	GJV E-mail D. Schroeder and J. Joseph re: DeMars deposition and email K. Burghardt Kramer	0.30 320.00/hr	96.00
	SM Draft memo re work product privilege	2.10 200.00/hr	420.00
	SM Research re motions to compel and privilege	1.40 200.00/hr	280.00
	KBK Review email from Sarah Merlo regarding Rule 30(b)(6) issues	0.30 175.00/hr	52.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/27/2019	KBK Email to Geoffrey Vitt, Sarah Nunan and Julia Korkus regarding pending tasks	0.20 175.00/hr	35.00
	KBK Exchange emails with Geoffrey Vitt regarding deposition of Leslie DeMars	0.10 175.00/hr	17.50
	KBK Receive and review deposition notice for Robert Bancroft and forward notice to Robert Bancroft	0.10 175.00/hr	17.50
	JK Email w/ G. Vitt re: Padin deposition and document evidence	0.10 100.00/hr	10.00
9/29/2019	GJV Review memorandum on Rule 30(b)(6) issue	0.20 320.00/hr	64.00
9/30/2019	GJV Outline for DeMars	0.30 320.00/hr	96.00
	JK Revise discovery response to third request from D-H; conf. W/ G. Vitt, email to M. Blanchette Porter; prepare final set for review; review corr and client documents	2.30 100.00/hr	230.00
	For professional services rendered	227.80	\$39,688.50
	Additional Charges :		
8/26/2019	Deposition Costs for: O'Brien Reporting Service		597.15
8/27/2019	Deposition Costs for: Verbatim Reporters		548.80
9/4/2019	Electronic research charges.		20.54
9/18/2019	Deposition Costs for: North Country Court Reporters - Transcript for J. Conroy		546.85
9/24/2019	Electronic research charges.		51.87
9/25/2019	Deposition Costs for: Blue Sparrow Kitchen		57.46
	Electronic research charges.		4.19
	Deposition Costs for: North Country Court Reporter, Maria Padin		1,192.65
9/26/2019	Electronic research charges.		38.12
9/27/2019	Electronic research charges.		199.69
	Total costs		\$3,257.32
	Total amount of this bill		\$42,945.82

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Previous balance

Amount

\$115,770.40

9/17/2019 Payment - thank you

(\$35,000.00)

Total payments and adjustments

(\$35,000.00)

Balance due

\$123,716.22

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	60.00	320.00	\$19,200.00
Julia Korkus	55.10	100.00	\$5,510.00
Katherine B. Kramer	46.30	175.00	\$8,102.50
Sarah Nunan	41.20	80.00	\$3,296.00
Sarah Merlo	17.90	200.00	\$3,580.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

November 19, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-13942

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2019 GJV Review draft interrogatory answers	0.20 320.00/hr	64.00
KBK Receive and review email from Misty Porter regarding strategy	0.10 175.00/hr	17.50
KBK Telephone conference with Julia Korkus	0.30 175.00/hr	52.50
KBK Telephone conference with Bob Bancroft	0.30 175.00/hr	52.50
KBK Draft motion to compel with regards to fourth set of interrogatories and requests to produce	3.00 175.00/hr	525.00
KBK Exchange emails with Misty Porter regarding expert report	0.30 175.00/hr	52.50
KBK Second telephone conference with Bob Bancroft	0.20 175.00/hr	35.00
KBK Email to Don Schroeder and Jessica Joseph regarding updated response to interrogatory #8	0.20 175.00/hr	35.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2019	KBK	Exchange emails with Geoffrey Vitt regarding motion to compel	0.10 175.00/hr	17.50
	JK	Prepare Plaintiff's Response to Defendants' Third Request for Production of Documents, and Plaintiff's Second Production	1.50 100.00/hr	150.00
	JK	Receive and review Joanne Conroy deposition transcript	2.70 100.00/hr	270.00
	JK	Emails, phone calls, document review re: updates to expert report w/ KBK and Robert Bancrot	0.70 100.00/hr	70.00
10/2/2019	KBK	Exchange emails with Julia Korkus regarding updated expert report	0.10 175.00/hr	17.50
	KBK	Review updated draft expert report from Bob Bancroft	0.20 175.00/hr	35.00
	KBK	Revise and finalize motion to compel responses to fourth set of interrogatories and requests to produce	0.20 175.00/hr	35.00
	JK	Phone call w/ Katie Burghardt Kramer re: updated expert report	0.30 100.00/hr	30.00
	JK	Receive and review revised report from Robert Bancroft, prepare list of detailed edits/corrections	1.40 100.00/hr	140.00
	JK	Preparation for DeMars deposition reference for G. Vitt	2.80 100.00/hr	280.00
10/3/2019	GJV	T/c K. Kramer re: pending discovery issues	0.20 320.00/hr	64.00
	GJV	Outline for DeMars deposition	1.40 320.00/hr	448.00
	GJV	Two file memos	0.20 320.00/hr	64.00
	KBK	Telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
	KBK	Telephone conference with Bob Bancroft	0.50 175.00/hr	87.50
	KBK	Telephone conference with Julia Korkus	0.20 175.00/hr	35.00
	KBK	Research discovery sanctions orders and email to Geoffrey Vitt regarding same	0.30 175.00/hr	52.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2019	KBK Email to Geoffrey Vitt regarding expert deposition	0.10 175.00/hr	17.50
	KBK Review revised report from Bob Bancroft	0.20 175.00/hr	35.00
	JK Separate phone calls and emails w/ Robert Bancroft and K. Burghardt Kramer to discuss economic report, damages, rate/resume information	0.70 100.00/hr	70.00
	JK Scan and save exhibits used in Conroy deposition.	0.60 100.00/hr	60.00
	JK Preparation for DeMars deposition reference for G. Vitt	3.20 100.00/hr	320.00
	JK Review motion to compel	0.60 100.00/hr	60.00
10/4/2019	GJV T/c K. Kramer and M. Porter re: depositions; review M. Porter email	0.50 320.00/hr	160.00
	GJV Outline for DeMars deposition	2.90 320.00/hr	928.00
	KBK Receive and review updated response to interrogatory #8	0.20 175.00/hr	35.00
	KBK Telephone conference with Bob Bancroft	0.30 175.00/hr	52.50
	KBK Exchange emails with Geoffrey Vitt regarding Leslie DeMars	0.30 175.00/hr	52.50
	KBK Telephone conference with Geoffrey Vitt	0.40 175.00/hr	70.00
	KBK Email to Jessica Joseph regarding revised response to Interrogatory #8	0.40 175.00/hr	70.00
	KBK Exchange emails with Geoffrey Vitt regarding Leslie DeMars deposition preparation	0.70 175.00/hr	122.50
	JK Receive and review new physician agreement from MBP; email w/ MBP	0.20 100.00/hr	20.00
	JK Discussion w/ GJV re: preparation for DeMars deposition. Update and compare text messages btw DeMars and MBP	1.40 100.00/hr	140.00
10/5/2019	GJV Outline for DeMars deposition	2.50 320.00/hr	800.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/7/2019	GJV	DeMars outline	4.50 320.00/hr	1,440.00
	GJV	Review defendants' answer to interrogatories and email K. Kramer	0.30 320.00/hr	96.00
10/8/2019	GJV	DeMars outline	3.20 320.00/hr	1,024.00
	JK	New documents re: Padin deposition, review documents	1.50 100.00/hr	150.00
	JK	Receive and review Padin deposition transcript	1.60 100.00/hr	160.00
10/9/2019	GJV	Outline DeMars; emails	0.20 320.00/hr	64.00
	JK	Preparation for DeMars	1.30 100.00/hr	130.00
	JK	Review Padin testimony for quotes log	2.60 100.00/hr	260.00
	SN	Email exchange with GJV RE mediation and DH's position	0.20 80.00/hr	16.00
10/10/2019	GJV	Outline for DeMars deposition	2.90 320.00/hr	928.00
	KBK	Receive and review email from Jessica Joseph regarding procedures without consent; exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK	Exchange emails with Sarah Nunan regarding document custodians	0.10 175.00/hr	17.50
	KBK	E-mail to Julia Korkus regarding expert report	0.10 175.00/hr	17.50
	JK	Separate emails w/ Robert Bancroft and Katie Burgardt Kramer re: revised expert reports - review and provide edits	0.80 100.00/hr	80.00
	JK	Conf. w/ SHN on Padin deposition testimony, receive and review related emails	0.50 100.00/hr	50.00
	JK	Deposition preparation for DeMars: discovery document review	2.50 100.00/hr	250.00
10/11/2019	GJV	Review Merrens exhibits and deposition and prepare outline for DeMars deposition	2.90 320.00/hr	928.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2019	KBK	Telephone conference with Julia Korkus regarding discovery	0.10 175.00/hr	17.50
	JK	Emails w/ Robert Bancroft and D-H Counsel re: updated expert report	0.30 100.00/hr	30.00
	JK	Phone call w/ Katie Kramer re: discovery	0.10 100.00/hr	10.00
	JK	Preparation for DeMars deposition re: credentials and references discovery	2.80 100.00/hr	280.00
10/15/2019	JK	Review correspondence from Vitt to Schroeder and Joseph; review documents for custodians	0.80 100.00/hr	80.00
10/16/2019	KBK	Receive and review email from Jessica Joseph regarding mediation	0.10 175.00/hr	17.50
10/17/2019	GJV	DeMars deposition prep	3.90 320.00/hr	1,248.00
	GJV	Review documents for DeMars deposition	4.80 320.00/hr	1,536.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition of Leslie DeMars	0.20 175.00/hr	35.00
10/18/2019	GJV	Prepare for DeMars deposition	6.80 320.00/hr	2,176.00
	KBK	Exchange emails with Geoffrey Vitt regarding privileged documents	0.10 175.00/hr	17.50
	KBK	Email to Jo LaMarche regarding document under court review	0.20 175.00/hr	35.00
	KBK	Review Dartmouth-Hitchcock's opposition to Plaintiff's motion to compel response to Plaintiff's fourth set of requests to produce	0.50 175.00/hr	87.50
	KBK	Draft reply brief in support of motion to compel	1.00 175.00/hr	175.00
	KBK	Exchange emails with Geoffrey Vitt and Misty Porter regarding DeMars deposition	0.20 175.00/hr	35.00
	JK	Deposition preparation for Leslie DeMars	4.70 100.00/hr	470.00
	GJV	E-mail K. Kramer and J. Joseph	0.20 320.00/hr	64.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/19/2019	GJV	Prepare for DeMars deposition; emails with K. Kramer	7.80 320.00/hr	2,496.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition of Leslie DeMars	0.20 175.00/hr	35.00
10/20/2019	GJV	Prepare for DeMars deposition	6.80 320.00/hr	2,176.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition of Leslie DeMars	0.30 175.00/hr	52.50
10/21/2019	GJV	Prepare for DeMars deposition	7.20 320.00/hr	2,304.00
	KBK	Receive and review emails from Geoffrey Vitt regarding deposition of Leslie DeMars	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt regarding status and next steps	0.10 175.00/hr	17.50
	KBK	Review and revise deposition outline for Leslie DeMars	0.30 175.00/hr	52.50
	JK	Meeting w/ G. Vitt and phone call w/ S. Nunan re: preparation for DeMars deposition	1.50 100.00/hr	150.00
	JK	Preparation for DeMars deposition - document review	2.60 100.00/hr	260.00
	SN	Conf. Call with GJV and JK RE DeMars deposition goals	1.10 80.00/hr	88.00
10/22/2019	GJV	Prepare for DeMars deposition	8.50 320.00/hr	2,720.00
	KBK	Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Meetings with Geoffrey Vitt and Sarah Nunan regarding preparation for deposition of Leslie DeMars	4.80 175.00/hr	840.00
	KBK	Review communication from Judge Crawford's chambers regarding "Document 80"	0.20 175.00/hr	35.00
	KBK	Meeting with Geoffrey Vitt regarding preparation for deposition of Leslie DeMars	0.20 175.00/hr	35.00
	JK	Meeting w/GJV, KBK, SHN; and preparation for DeMars Deposition	7.50 100.00/hr	750.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
10/22/2019	SN	Conf with KBK, GJV and JK preparing for DeMars depostion	6.40 80.00/hr	512.00
10/23/2019	GJV	Deposition of L. DeMars	9.20 320.00/hr	2,944.00
	KBK	Attend deposition of Leslie DeMars, with breaks during deposition to discuss strategy	8.00 175.00/hr	1,400.00
	KBK	Meeting with Misty Porter, Geoffrey Vitt and Sarah Nunan after conclusion of deposition	1.00 175.00/hr	175.00
	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	JK	Prepare documents, attend deposition of Leslie DeMars	9.20 100.00/hr	920.00
	SN	Conf with GJV preparing exhibits for deposition	1.30 80.00/hr	104.00
	SN	Attended deposition of Leslie DeMars	9.00 80.00/hr	720.00
10/24/2019	GJV	Memo on additional discovery issues	0.30 320.00/hr	96.00
	GJV	Multiple emails and review decision by Judge Crawford and M. Porter email	0.40 320.00/hr	128.00
	KBK	Exchange emails with Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK	Assess options regarding "Document 80"	0.20 175.00/hr	35.00
	KBK	Email to Don Schroeder and Jessica Joseph regarding "Document 80"	0.40 175.00/hr	70.00
	KBK	Receive and review court's order granting motion to compel response to fourth set of discovery requests	0.20 175.00/hr	35.00
	KBK	Telephone conference with Geoffrey Vitt	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt and Misty Porter regarding status and next steps	0.10 175.00/hr	17.50
	KBK	Receive and review emails from Misty Porter and Geoffrey Vitt	0.10 175.00/hr	17.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/25/2019	GJV	T/c K. Kramer re: motion, production of documents, Dr. Bancroft deposition and Dr. McBean deposition and Notice McBean deposition	0.60 320.00/hr	192.00
	GJV	D. Schroeder email and mediation statement	0.50 320.00/hr	160.00
	KBK	Telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
	KBK	Telephone conference with Misty Porter	0.60 175.00/hr	105.00
	KBK	Call to Don Schroeder and leave message; call to Jessica Joseph and leave message; call to Geoffrey Vitt and leave message	0.10 175.00/hr	17.50
	KBK	Prepare and file joint motion for status conference	0.70 175.00/hr	122.50
	KBK	Telephone conference with Geoffrey Vitt regarding discovery issues	0.30 175.00/hr	52.50
	KBK	Email to Don Schroeder and Jessica Joseph regarding discovery deadlines and document custodians	0.40 175.00/hr	70.00
10/26/2019	GJV	E-mails with client re: mediation	0.20 320.00/hr	64.00
	GJV	E-mails with witness	0.10 320.00/hr	32.00
10/27/2019	SM	Review GJV email re: preparation for upcoming mediation	0.10 200.00/hr	20.00
	GJV	Memo to S. Merlo re: mediation research	0.20 320.00/hr	64.00
	GJV	Outline for mediation statement	0.50 320.00/hr	160.00
10/28/2019	KBK	Exchange emails with Julia Korkus regarding discovery issues	0.10 175.00/hr	17.50
	KBK	Exchange emails with Sarah Nunan regarding mediation preparation	0.10 175.00/hr	17.50
	KBK	Receive and review correspondence from Don Schroeder and Jessica Joseph regarding Bob Bancroft; receive and review response from Bob Bancroft	0.20 175.00/hr	35.00
	KBK	Exchange emails with Geoffrey Vitt regarding mediation preparation	0.10 175.00/hr	17.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/28/2019	KBK	Exchange emails with Judge Crawford's chambers and opposing counsel regarding status conference	0.20 175.00/hr	35.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery	0.10 175.00/hr	17.50
	JK	Receive & review Leslie DeMars expedited transcript of deposition	2.50 100.00/hr	250.00
	JK	Conference w/ G. Vitt & S. Nunan on mediation preparation	0.40 100.00/hr	40.00
	JK	Receive and review corr. from GJV and KBK re: expert credentials	0.10 100.00/hr	10.00
	JK	Receive and review corr. Re: deposition of Judy McBean; prepare notes on documents	0.40 100.00/hr	40.00
	GJV	Mediation statement including damages and issue with expert	0.50 320.00/hr	160.00
	GJV	Review Notice and email D. Schroeder	0.20 320.00/hr	64.00
	GJV	Review J. Joseph letter	0.10 320.00/hr	32.00
	GJV	Prepare for Bancroft deposition and questions for expert	1.60 320.00/hr	512.00
	SN	Conf. With GJV and JK regarding quotes and outline for mediation statement	0.40 80.00/hr	32.00
10/29/2019	KBK	Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Meeting with Geoffrey Vitt regarding strategy	0.40 175.00/hr	70.00
	KBK	Meeting with Bob Bancroft and Geoffrey Vitt to prepare for Bob Bancroft's deposition	1.50 175.00/hr	262.50
	KBK	Meeting with Julia Korkus regarding discovery	0.20 175.00/hr	35.00
	KBK	Meetings with Geoffrey Vitt, Sarah Nunan, and Julia Korkus regarding mediation, discovery, and strategy	1.50 175.00/hr	262.50
	KBK	Meet and confer telephone conference with Don Schroeder and Jessica Joseph	0.60 175.00/hr	105.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/29/2019	KBK Travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK Exchange emails with Misty Porter regarding strategy	0.20 175.00/hr	35.00
	KBK Exchange emails with Geoffrey Vitt regarding document custodians	0.30 175.00/hr	52.50
	JK Review and draft custodian letter per GJV	0.20 100.00/hr	20.00
	JK Phone conference w/ D-H and Vitt counsel re: discovery issues and schedule meet and confer.	0.70 100.00/hr	70.00
	JK Preparation and conference w/ GJV, KBK, SHN, re: mediation outline, discovery, claims chart	1.70 100.00/hr	170.00
	JK Prepare documents for GJV, brief meeting w/ Robert Bancroft, email to Misty Blanchette Porter re: economic information	0.20 100.00/hr	20.00
	JK Emails from G. Vitt; review documents and prepare summary re: discovery and requests; discussion w/ G. Vitt and K. Kramer on same	1.30 100.00/hr	130.00
	GJV Conference with B. Bancroft and conf. K. Kramer	2.20 320.00/hr	704.00
	GJV Review K. Kramer email re: DeMars and prepare email to K. Kramer, J. Korkus and S. Nunan re: status conf. and pending discovery	1.10 320.00/hr	352.00
	GJV Review damages issue and outline for Mediation Statement	1.20 320.00/hr	384.00
	GJV Conference call J. Joseph, D. Schroeder and K. Kramer	0.60 320.00/hr	192.00
	GJV E-mail J. Joseph re: document production and witnesses	0.30 320.00/hr	96.00
	SN Meeting with KBK and GJV	1.50 80.00/hr	120.00
	SN Conf. With JK and sent follow up email re discovery and documents	0.40 80.00/hr	32.00
10/30/2019	KBK Draft mediation statement	3.50 175.00/hr	612.50
	KBK Telephone conference with Geoffrey Vitt regarding deposition of Bob Bancroft	0.20 175.00/hr	35.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/30/2019	KBK Review notes from Bob Bancroft and emails from Geoffrey Vitt	0.90 175.00/hr	157.50
	KBK Exchange emails with Don Schroeder regarding discovery issues	0.40 175.00/hr	70.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00
	JK Preparation, deposition of Robert Bancroft, and meeting	3.30 100.00/hr	330.00
	JK Receive and review mediation statement; compare to current quotes list	0.40 100.00/hr	40.00
	JK Receive and review emails from D. Schroeder and KBK re: discovery issues	0.20 100.00/hr	20.00
	JK Discussion w/ G. Vitt re: discovery	0.10 100.00/hr	10.00
	GJV Review K. Kramer email re: discovery issues and prepare email to J. Joseph and D. Schroeder	0.50 320.00/hr	160.00
	GJV Outline for mediation statement	0.60 320.00/hr	192.00
	GJV Conf. B. Bancroft and deposition of Bancroft	4.80 320.00/hr	1,536.00
	GJV Review D. Schroeder email and email K. Kramer	0.30 320.00/hr	96.00
	GJV Mediation statement	1.20 320.00/hr	384.00
	SN Review email from GJV; conf. With GJV RE quotes and which to use	0.20 80.00/hr	16.00
10/31/2019	KBK Review information for preparation of mediation statement	0.30 175.00/hr	52.50
	KBK Exchange emails with Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00
	KBK Receive and review Defendants' second supplemental Rule 26 disclosures; email to Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK Exchange emails with Misty Porter and Geoffrey Vitt regarding discovery issues	0.20 175.00/hr	35.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/31/2019	JK Receive and review email from KBK and attached set of Def. Supplemental disclosures	0.30 100.00/hr	30.00
	JK Emails from G. Vitt. Prepare quotes memorandum re: mediation statement.	2.50 100.00/hr	250.00
	JK Email to Misty Blanchette Porter re: new physician compensation documents and question about correction	0.10 100.00/hr	10.00
	JK Conf. W/ GJV re: discovery and further economic report updates	0.10 100.00/hr	10.00
	JK Review set of Bancroft documents from deposition	1.60 100.00/hr	160.00
	GJV Mediation statement, opening statement and damages issue	4.60 320.00/hr	1,472.00
	For professional services rendered	240.50	\$48,111.50
	Additional Charges :		
10/23/2019	Deposition Costs for: Leslie DeMars- North Country Court Reporters		925.05
	Total costs		\$925.05
	Total amount of this bill		\$49,036.55
	Previous balance		\$123,716.22
10/14/2019	Payment - thank you		(\$22,000.00)
	Total payments and adjustments		(\$22,000.00)
	Balance due		\$150,752.77

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	99.70	320.00	\$31,904.00
Julia Korkus	72.50	100.00	\$7,250.00
Katherine B. Kramer	41.70	175.00	\$7,297.50
Sarah Nunan	20.50	80.00	\$1,640.00
Sarah Merlo	0.10	200.00	\$20.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

December 20, 2019

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14009

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2019	SN Meeting with clients, KBK, GJV RE mediation	2.00 80.00/hr	160.00
	KBK Review additional documents from Geoffrey Vitt regarding compensation and other documents for Misty Porter	0.20 175.00/hr	35.00
	KBK Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK Meeting with Misty Porter, Geoffrey Vitt, and Sarah Nunan to prepare for mediation	2.00 175.00/hr	350.00
	KBK Meeting with Geoffrey Vitt and Sarah Nunan regarding strategy	1.30 175.00/hr	227.50
	KBK Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK Prepare for status conference	0.70 175.00/hr	122.50
	SM Emails with GJV re: duty to supplement initial disclosures	0.20 200.00/hr	40.00
	SM Research re: supplementing initial disclosures	0.30 200.00/hr	60.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2019	JK Meeting w/ Geoffrey Vitt re: mediation statement	0.10 100.00/hr	10.00
	JK Preparation for mediation statement: draft quote document	1.20 100.00/hr	120.00
	GJV Mediation statement	1.90 320.00/hr	608.00
	GJV Conference with M. and T. Porter, KBK and SN	2.00 320.00/hr	640.00
	GJV Conf. K. Kramer and revise Mediation Statement	1.00 320.00/hr	320.00
	GJV E-mail D. Schroeder and mediator	0.20 320.00/hr	64.00
	GJV E-mails with D. Schroeder and file memorandum	0.30 320.00/hr	96.00
11/2/2019	SM Emails with GJV re: ethics of contact with employees of represented entity defendant	0.10 200.00/hr	20.00
	GJV Conference call with court and counsel; t/c K. Kramer to prepare for call	1.60 320.00/hr	512.00
	GJV Mediation outline	0.70 320.00/hr	224.00
	GJV Review draft mediation statement	0.80 320.00/hr	256.00
	GJV E-mails K. Kramer and M. Porter	0.40 320.00/hr	128.00
	GJV Review final mediation statement and email K. Kramer	0.50 320.00/hr	160.00
11/3/2019	KBK Prepare for status conference	0.70 175.00/hr	122.50
	KBK Revise mediation statement	0.50 175.00/hr	87.50
	GJV Mediation e-mails	0.20 320.00/hr	64.00
	GJV Prepare for mediation including mediation statement	3.40 320.00/hr	1,088.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/3/2019	GJV T/c J. Gonyea and prepare file memorandum	0.80 320.00/hr	256.00
11/4/2019	KBK Travel to Rutland for status conference with court	1.00 175.00/hr	NO CHARGE
	KBK Prepare for status conference	0.40 175.00/hr	70.00
	KBK Status conference with Judge Crawford regarding discovery issues	1.30 175.00/hr	227.50
	KBK Return travel from Rutland	1.00 175.00/hr	NO CHARGE
	KBK Email to Misty Porter regarding status conference	0.20 175.00/hr	35.00
	KBK Revise mediation statement	1.30 175.00/hr	227.50
	KBK Receive and review emails from Jessica Joseph and court clerk regarding docket entry	0.10 175.00/hr	17.50
	KBK Finalize and circulate mediation statement to Greg Clayton and counsel	1.90 175.00/hr	332.50
	SM Emails with GJV re: ex parte communications with employees of opposing party	0.20 200.00/hr	40.00
	SM Research re: current developments in Rule 4.2 of the VT Rules of Professional Conduct and equivalents as applied to employees of corporate opponent	2.00 200.00/hr	400.00
	GJV Conference with Court and counsel; t/c K. Kramer to prepare for call	1.60 320.00/hr	512.00
	GJV Mediation outline	0.70 320.00/hr	224.00
	GJV Review draft mediation statement	0.80 320.00/hr	256.00
	GJV E-mails with K. Kramer and M. Porter	0.40 320.00/hr	128.00
	GJV Review final mediation statement and email K. Kramer	0.50 320.00/hr	160.00
11/5/2019	SN Conference with GJV on draft versions of opening mediation statements	1.10 80.00/hr	88.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/5/2019	KBK Receive and review mediation statement from Dartmouth-Hitchcock	0.10 175.00/hr	17.50
	KBK Telephone conferences with Geoffrey Vitt regarding mediation and strategy	0.30 175.00/hr	52.50
	KBK Email to Misty Porter regarding mediation and strategy	0.10 175.00/hr	17.50
	KBK Telephone conference with Misty Porter regarding mediation and strategy	0.30 175.00/hr	52.50
	SM Tel. call w/ SHN re: research strategies to develop demand in preparation for mediation	0.20 200.00/hr	40.00
	SM Research re: value of employment-related claims	0.50 200.00/hr	100.00
	JK Brief conf. w/ G. Vitt and mediation preparation - prepare reference documents.	1.70 100.00/hr	170.00
	GJV Mediation e-mails	0.20 320.00/hr	64.00
	GJV T/c J. Gonhea and prepare file memo	0.80 320.00/hr	256.00
	GJV Work on mediation statement and issues	3.10 320.00/hr	992.00
	GJV Conference with S. Nunan re. mediation statement	1.10 320.00/hr	352.00
11/6/2019	KBK Receive and review email and file memorandum from Geoffrey Vitt regarding witness interview	0.20 175.00/hr	35.00
	KBK Telephone conference with Geoffrey Vitt	0.30 175.00/hr	52.50
	KBK Review court order on "document 80" and discovery issues	0.10 175.00/hr	17.50
	JK Email from G. Vitt; Mediation preparation	1.50 100.00/hr	150.00
	GJV Prepare for mediation including conference with M. Porter and Dr. Blanchette, conf. with K. Kramer, and review mediation statements	5.80 320.00/hr	1,856.00
11/7/2019	SN Conf. call with GJV before mediation to review opening statement	0.50 80.00/hr	40.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/7/2019	SN Conf call with KBK and GJV re mediation	0.10 80.00/hr	8.00
	SN Conf. Call with GJV RE next steps	0.20 80.00/hr	16.00
	KBK Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK Prepare for mediation	0.90 175.00/hr	157.50
	KBK Mediation at Hanover Inn with Misty Porter, Geoffrey Vitt, opposing counsel, mediator, and others	4.00 175.00/hr	700.00
	KBK Meeting with Geoffrey Vitt regarding strategy	0.70 175.00/hr	122.50
	KBK Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	KBK Exchange emails with Misty Porter	0.30 175.00/hr	52.50
	KBK Receive and review emails from Geoffrey Vitt regarding strategy	0.20 175.00/hr	35.00
	JK Email from G. Vitt; Mediation preparation	0.50 100.00/hr	50.00
	JK Mediation debrief from Katie Burghardt Kramer (and Geoffrey Vitt in part)	0.20 100.00/hr	20.00
	JK Prepare memo and document support for G. Vitt on disputed facts in Defendants mediation statement	1.60 100.00/hr	160.00
	GJV Mediation and conf. Dr. T. Porter; Conf. w/ S. Nunan and K. Kramer	5.70 320.00/hr	1,824.00
	GJV E-mails with G. Clayton	0.30 320.00/hr	96.00
11/8/2019	JK Receive and review report of Early Neutral Evaluator, G. Clayton	0.10 100.00/hr	10.00
	GJV E-mails and review next steps	0.30 320.00/hr	96.00
11/9/2019	SN Conf. Call with Greg Clayton RE mediation feedback	0.40 80.00/hr	32.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/9/2019	GJV	File memorandum on trial testimony of UVM witnesses and Herrick	1.30 320.00/hr	416.00
	GJV	Memorandum on Brumsted and Bernstein testimony	1.10 320.00/hr	352.00
	GJV	E-mail to K. Kramer, S. Nunan, and J. Korkus re: trial issues, witnesses, subpoenas	1.50 320.00/hr	480.00
11/11/2019	SN	Conf. Call with K. Kramer and GJV RE conversation with Greg Clayton	0.40 80.00/hr	32.00
	SN	Call with GJV RE mediation feedback from Clayton and strategy	0.60 80.00/hr	48.00
	KBK	Receive and review emails from Geoffrey Vitt regarding strategy and next steps	0.20 175.00/hr	35.00
	KBK	Telephone conference with Geoffrey Vitt regarding strategy	0.30 175.00/hr	52.50
	KBK	Telephone conference with Sarah Nunan regarding strategy	0.40 175.00/hr	70.00
	GJV	Review aspects of Opening Statement and evidence issues	0.90 320.00/hr	288.00
	GJV	File memo on exhibits, subpoenas, and Leslie DeMars	0.30 320.00/hr	96.00
	GJV	Memo on 3rd party subpoena and Brumsted and Bernstein subpoenas and trial testimony	0.40 320.00/hr	128.00
	GJV	T/c K. Kramer re: mediation, 3rd party subpoena, and J. McBean depo	0.20 320.00/hr	64.00
	GJV	Review evidence re: third party witnesses	0.60 320.00/hr	192.00
	GJV	T/c K. Kramer and S. Nunan re: mediation issues and 3rd party discovery	0.40 320.00/hr	128.00
11/12/2019	GJV	Review deposition transcript	0.20 320.00/hr	64.00
11/13/2019	KBK	Exchange emails with Geoffrey Vitt regarding strategy	0.10 175.00/hr	17.50
	JK	Emails on trial strategy from/with GJV, KBK, SHN, review notes.	0.50 100.00/hr	50.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
11/13/2019	GJV	Memo to K. Kramer, S. Nunan, and J. Korkus re: trial, subpoenas, depositions and witnesses	1.20 320.00/hr	384.00
	GJV	Conf. S. Nunan re: 3rd party discovery, subpoenas, and trial issues	0.50 320.00/hr	160.00
	GJV	Outline re: response to motion for summary judgment	0.70 320.00/hr	224.00
	SN	Conf. with G. Vitt RE. trial strategy and depositions	0.50 80.00/hr	40.00
11/14/2019	SN	Conf. call with KBK, GJV, and JK RE last deposition and planning for opposition to MSJ	1.30 80.00/hr	104.00
	KBK	Prepare file memorandum regarding mediation and circulate to team	1.40 175.00/hr	245.00
	KBK	Telephone conference with Geoffrey Vitt, Sarah Nunan and Julia Korkus regarding discovery and next steps	1.30 175.00/hr	227.50
	KBK	Telephone conference with Don Schroeder regarding depositions and email to Don Schroeder and Jessica Joseph regarding same	0.20 175.00/hr	35.00
	KBK	Receive and review email from Jessica Joseph regarding depositions; email to Misty Porter regarding depositions	0.10 175.00/hr	17.50
	JK	Prepare for meeting, review emails from G. Vitt; Meeting w/ G. Vitt, K.Burghardt Kramer, S. Nunan re: strategy, planing, witnesses, and 3rd party subpoenas.	1.50 100.00/hr	150.00
	JK	Prepare drafts of subpoenas w/ attachments and notices for carriers; conf. w/ G. Vitt about same.	2.10 100.00/hr	210.00
	JK	Prepare file memo	0.30 100.00/hr	30.00
	JK	Receive and review R. Bancroft deposition transcript; emails w/ R. Bancroft	1.10 100.00/hr	110.00
	GJV	Review third party d iscovery issues and disability claims and review HR depo issue	0.50 320.00/hr	160.00
	GJV	Conf. call K. Kramer, S. Nunan, and J. Korkus re: HR deposition, summary judgement, trial	1.30 320.00/hr	416.00
	GJV	Review K. Kramer memo on mediation	0.20 320.00/hr	64.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/14/2019	GJV	E-mail M. Porter re: Ira Bernstein	0.20 320.00/hr	64.00
11/15/2019	KBK	Exchange emails with Misty Porter regarding strategy and next steps	0.10 175.00/hr	17.50
	KBK	Receive and review email from Geoffrey Vitt regarding strategy	0.10 175.00/hr	17.50
	JK	Review rules and insurance documents; research carrier information; phone calls and web search on Unum and Hartford re; subpoenas to disability insurance carriers; prepare correspondence	4.10 100.00/hr	410.00
	JK	Receive and review memo on mediation	0.40 100.00/hr	40.00
	GJV	Two emails from M. Porter and revise 3 memos re: UVM and Brumsted and Bernstein testimony	1.10 320.00/hr	352.00
	GJV	Revise and edit two memos re: UVM	0.20 320.00/hr	64.00
11/16/2019	GJV	Review cases on cats' paw theory	0.20 320.00/hr	64.00
11/18/2019	SN	Conf. With GJV and JK RE topics for Amy Giglio deposition	0.70 80.00/hr	56.00
	KBK	Exchange emails with Geoffrey Vitt regarding deposition of Aimee Giglio	0.10 175.00/hr	17.50
	KBK	Exchange emails with Jessica Joseph and Don Schroeder regarding deposition of Aimee Giglio	0.20 175.00/hr	35.00
	JK	Conf. w/ GJV and SHN re: Aimee Giglio Deposition planning	0.70 100.00/hr	70.00
	JK	Prepare of memo of meeting w/ GJV, SHN on Aimee Giglio Deposition Planning; search and review Giglio background	0.70 100.00/hr	70.00
	JK	Review HR and Giglio topics	1.30 100.00/hr	130.00
	JK	Deposition Preparation re: Aimee Giglio and review prior deposition transcript references and exhibits for GJV.	2.40 100.00/hr	240.00
	GJV	Review deposition issues	0.20 320.00/hr	64.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/18/2019	GJV	Conference with J. Korkkus and S. Nunan re: Giglio deposition	0.70 320.00/hr	224.00
	GJV	Outline for Giglio deposition and memo to K. Kramer and S. Nunan	1.40 320.00/hr	448.00
11/19/2019	KBK	Receive and review email from Don Schroeder regarding deposition of Aimee Giglio	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt regarding discovery production by Dartmouth-Hitchcock	0.20 175.00/hr	35.00
	JK	Prepare and send final subpoenas and correspondence re: carriers	2.70 100.00/hr	270.00
	JK	Receive and review Prod 19 from D-H	3.50 100.00/hr	350.00
	JK	Receive and review memo's from GJV.	0.20 100.00/hr	20.00
	GJV	Review interrogatory answers and documents from DH	0.30 320.00/hr	96.00
	GJV	Review answers and responses and email K. Kramer re: deficiencies in responses	0.70 320.00/hr	224.00
11/20/2019	SN	Conf with GJV RE documents and preparing for A. Giglio's deposition	0.30 80.00/hr	24.00
	KBK	Receive and review defendants' responses to plaintiff's fourth set of interrogatories and requests to produce	0.60 175.00/hr	105.00
	KBK	Email to Geoffrey Vitt regarding insufficiencies in DH's interrogatory responses, with research on work product objection	0.50 175.00/hr	87.50
	KBK	Receive and review emails from Geoffrey Vitt and Don Schroeder regarding discovery issues	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt regarding defendants' responses to plaintiff's fourth set of interrogatories	0.40 175.00/hr	70.00
	KBK	Review file memoranda from Geoffrey Vitt	0.10 175.00/hr	17.50
	JK	Conf. and emails w/ G. Vitt re: Aimee Giglio deposition preparation, exhibits; personnel file	0.40 100.00/hr	40.00
	JK	Prepare memo of 11/18 meeting w/ G. Vitt and S. Nunan and Giglio background review	0.60 100.00/hr	60.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/20/2019	JK	Receive and review Defendants' Answers/Responses to Plaintiff's Fourth Set of Interrogatories/Requests for Documents	0.80 100.00/hr	80.00
	JK	Review D-H Production 19; prepare key documents	3.80 100.00/hr	380.00
	GJV	Giglio deposition preparation and email with Schroeder	0.30 320.00/hr	96.00
	GJV	Review defendants' answers to interrogatories; K. Kramer analysis of work product and draft letter to D. Schroeder	1.10 320.00/hr	352.00
	GJV	Review K. Kramer email and respond	0.20 320.00/hr	64.00
11/21/2019	SN	Conf. With GJV re Amy Giglio deposition	0.20 80.00/hr	16.00
	SN	Conf. With JK RE Amy Giglio documents and new production	0.30 80.00/hr	24.00
	KBK	Email to Julia Korkus regarding document production	0.10 175.00/hr	17.50
	SN	Reviewing GJV memos on Giglio and Bernstein; outline deposition topics	1.20 80.00/hr	96.00
	SN	Conf. Call with GJV RE Giglio deposition	0.30 80.00/hr	24.00
	JK	Conf. w/ S. Nunan; Prepare and scan Prod 19 Giglio document set for SHN	1.50 100.00/hr	150.00
	JK	Review D-H Production 19 and prepare key documents	4.70 100.00/hr	470.00
	GJV	Giglio depo outline	0.30 320.00/hr	96.00
	GJV	Email D. Schroder re: interrogatory answers	0.30 320.00/hr	96.00
	GJV	Conference with S. Nunan RE. deposition of Giglio	0.20 320.00/hr	64.00
11/22/2019	JK	Giglio Deposition Preparation; and Review of Production 19, prepare memo and set of key documents	6.50 100.00/hr	650.00
11/23/2019	GJV	Review Giglio deposition outline and documents identified	0.80 320.00/hr	256.00

Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/23/2019	GJV Review J. Korkus email	0.20 320.00/hr	64.00
	GJV Giglio documents and latest production	1.30 320.00/hr	416.00
11/24/2019	GJV Email K. Kramer re: privilege log and interrogatories	0.20 320.00/hr	64.00
	GJV Giglio outline	0.30 320.00/hr	96.00
11/25/2019	KBK Receive and review email from Julia Korkus regarding Production 19	0.20 175.00/hr	35.00
	KBK Telephone conference with Geoffrey Vitt regarding discovery and next steps	0.20 175.00/hr	35.00
	KBK Review key documents from Production 19	1.20 175.00/hr	210.00
	KBK Receive and review email from Jessica Joseph regarding meet-and-confer; exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	KBK Telephone conference with Julia Korkus regarding defendants' production in response to plaintiff's fourth set of requests to produce	0.20 175.00/hr	35.00
	SN Reviewed documents from J. Korkus RE Giglio	1.20 80.00/hr	96.00
	SN Prepared notes for call with GJV RE Giglio documents	0.30 80.00/hr	24.00
	JK Telephone call w/ K. Burghardt Kramer re: D-H Production 19 response - key documents	0.20 100.00/hr	20.00
	JK Review D-H Production 19; scan key documents, downloading native and image files to systems.	4.70 100.00/hr	470.00
	GJV Email J. Korkus re: A Giglio and documents from DH	0.20 320.00/hr	64.00
	GJV Email K. Kramer e: privilege log and interrogatory answers	0.20 320.00/hr	64.00
	GJV T/c K. Kramer	0.20 320.00/hr	64.00
	GJV Conf. J. Korkus re: Giglion depo and email S. Nunan re: deposition and review production of documents re: Giglio	1.30 320.00/hr	416.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/25/2019	GJV	E-mails with J. Joseph	0.10 320.00/hr	32.00
11/26/2019	KBK	Review and assess selected documents from defendants' Production 19	1.60 175.00/hr	280.00
	KBK	Exchange emails with Geoffrey Vitt regarding discovery issues	0.10 175.00/hr	17.50
	KBK	Telephone conference with Jessica Joseph and Geoffrey Vitt regarding discovery issues	0.50 175.00/hr	87.50
	KBK	Email to Jessica Joseph and Don Schroeder regarding discovery conference and defendants' incomplete interrogatory responses	0.60 175.00/hr	105.00
	KBK	Telephone conference with Geoffrey Vitt	0.20 175.00/hr	35.00
	JK	Prepare memo on D-H mediation statement - gather supporting documents	2.30 100.00/hr	230.00
	JK	Deposition Preparation re: Aimee Giglio and previous deposition transcript references and exhibits for GJV.	2.50 100.00/hr	250.00
	GJV	Giglio depo preparation	0.10 320.00/hr	32.00
	GJV	E-mail K. Kramer re: privilege issue	0.10 320.00/hr	32.00
	GJV	Review privilege info	0.10 320.00/hr	32.00
	GJV	Conference call K. Kramer and J. Joseph re: document production issues	0.50 320.00/hr	160.00
	GJV	T/c K. Kramer re: document production	0.20 320.00/hr	64.00
11/27/2019	SN	Conf. call with GJV RE Giglio documents	0.70 80.00/hr	56.00
	SN	Drafted deposition questions on 4/17 meetings	0.30 80.00/hr	24.00
	JK	Review D-H Production 19 documents, prepare and scan key documents	4.20 100.00/hr	420.00
	GJV	Giglio deposition preparation	2.90 320.00/hr	928.00



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/27/2019	GJV T/c S. Nunan and review notes	0.70 320.00/hr	224.00
11/29/2019	GJV Giglio outline and t/c S. Nunan	1.90 320.00/hr	608.00
	SN Conf. call with GJV RE. Giglio	0.20 80.00/hr	16.00
11/30/2019	SN Developing outline and questions for Giglio deposition	0.60 80.00/hr	48.00
	SN Conf. Call with GJV RE Giglio deposition	0.30 80.00/hr	24.00
	GJV Conference call with S. Nunan re. Giglio depositions	0.30 320.00/hr	96.00
	For professional services rendered	180.80	\$33,964.00
	Additional Charges :		
12/29/2019	Witness fee expense. Robert L. Bancroft		2,628.00
10/30/2019	Deposition Costs for: Robert L. Bancroft, Ph.D - O'Brien Reporting Services		277.60
11/4/2019	Electronic research charges.		165.49
11/5/2019	Electronic research charges.		18.17
11/7/2019	Deposition Costs for: Clayton Mediation		700.00
	Parking		18.00
11/19/2019	Service fee: Office of Secretary of State, Vermont - for 2- service fee two corporate subpoenas		50.00
	Total costs		\$3,857.26
	Total amount of this bill		\$37,821.26
	Previous balance		\$150,752.77
12/3/2019	Payment - thank you		(\$30,000.00)
12/13/2019	Payment - thank you		(\$10,000.00)
	Total payments and adjustments		(\$40,000.00)

Misty Porter

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Amount

Balance due

\$148,574.03

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	65.40	320.00	\$20,928.00
Julia Korkus	60.60	100.00	\$6,060.00
Katherine B. Kramer	29.60	175.00	\$5,180.00
Sarah Nunan	13.70	80.00	\$1,096.00
Sarah Merlo	3.50	200.00	\$700.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

January 8, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14039

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2019	SN	Drafted case-in-chief document for Porter trial	2.60 80.00/hr	208.00
	SN	Conf. Call with GJV RE case-in-chief and effect on Giglio deposition	0.80 80.00/hr	64.00
	SN	Reviewed email from GJV on Giglio	0.20 80.00/hr	16.00
	GJV	Giglio deposition preparation	1.90 320.00/hr	608.00
	KBK	Receive and review revised privilege log from DHMC	0.10 175.00/hr	17.50
	KBK	Draft stipulated motion for in camera review of privileged documents	0.20 175.00/hr	35.00
	KBK	Exchange emails with Jessica Joseph and Don Schroeder regarding unopposed motion for in camera review	0.20 175.00/hr	35.00
	GJV	Conf. call with S. Nunan re. Giglio deposition	0.80 320.00/hr	256.00
12/2/2019	GJV	Email Schroeder re: discovery issues	0.20 320.00/hr	64.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2019	GJV	E-mails with client	0.30 320.00/hr	96.00
	GJV	Review motion and email w/ D. Schroeder	0.20 320.00/hr	64.00
	SN	Email to GJV	0.20 80.00/hr	16.00
	SN	Conf call with GJV	0.10 80.00/hr	8.00
	SN	Conf. Call with JK RE documents for Giglio and outstanding discovery for case-in-chief	0.50 80.00/hr	40.00
	JK	Phone conf. with SHN re: Giglio deposition preparation; Draft emails w/ document links and brief summary.	1.40 100.00/hr	140.00
	JK	Discuss D-H production files and search process; Export native files and msg files.	0.80 100.00/hr	80.00
	JK	Receive and compare supplemental Privilege Log to prior versions; respond to GJV email w/ summary of same.	0.40 100.00/hr	40.00
	GJV	Conf. call with S. Nunan	0.30 320.00/hr	96.00
12/3/2019	GJV	Emails with client and counsel re: Giglio deposition and motion	0.40 320.00/hr	128.00
	GJV	Review documents for Giglio and possible subpoena	0.40 320.00/hr	128.00
	GJV	Prepare for Giglio deposition	2.60 320.00/hr	832.00
	GJV	T/c M. Porter	0.40 320.00/hr	128.00
	GJV	Several e-mails	0.40 320.00/hr	128.00
	KBK	Receive and review emails from Geoffrey Vitt and Don Schroeder regarding motion for in camera review; receive and review filed motion for in camera review	0.10 175.00/hr	17.50
	JK	Emails w/ G. Vitt and phone call to VT Secretary of State office re: status of corporate subpoenas to insurance carriers	0.40 100.00/hr	40.00
	JK	Giglio document deposition preparation for GJV; scan and email documents links and summary to SHN.	3.70 100.00/hr	370.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/3/2019	JK	Discuss D-H answers to Plaintiff's fourth set of interrogatories w/ G. Vitt; gather documents on same.	0.20 100.00/hr	20.00
12/4/2019	GJV	Prepare for Giglio deposition	3.40 320.00/hr	1,088.00
	JK	Document and question preparation for Giglio deposition	4.60 100.00/hr	460.00
12/5/2019	GJV	Letter to D. Schroeder	0.20 320.00/hr	64.00
	GJV	Outline for Giglio deposition	0.90 320.00/hr	288.00
	JK	Correspondence w/ Unum legal department re: subpoena for documents; discuss same w/ GJV.	0.20 100.00/hr	20.00
	JK	Giglio deposition preparation - prepare and print documents for GJV.	3.40 100.00/hr	340.00
12/6/2019	GJV	Preparation for Giglio deposition	3.40 320.00/hr	1,088.00
	KBK	Receive and review correspondence from Geoffrey Vitt to Don Schroeder regarding interrogatories	0.10 175.00/hr	17.50
	JK	Phone calls and correspondence w/ Unum legal department re: subpoena for documents; discuss same w/ GJV.	0.90 100.00/hr	90.00
	JK	Prepare and deliver final draft of additional Giglio questions to G. Vitt.	2.60 100.00/hr	260.00
12/7/2019	GJV	Prepare for A. Giglio deposition	3.90 320.00/hr	1,248.00
	SN	Reviewing documents and preparing for Giglio deposition	1.80 80.00/hr	144.00
	SN	Reviewing GJV's outlines and preparing for meeting with GJV	1.60 80.00/hr	128.00
	SN	Conf. Call with GJV RE outlines	0.70 80.00/hr	56.00
	GJV	Conference call with S. Nunan re: witness matters	0.70 320.00/hr	224.00
12/8/2019	GJV	A. Giglio deposition preparation	4.30 320.00/hr	1,376.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/8/2019	SN	Preparing questions for deposition of Amy Giglio	0.80 80.00/hr	64.00
12/9/2019	GJV	Prepare for A. Giglio deposition	3.70 320.00/hr	1,184.00
	KBK	Telephone conference with Geoffrey Vitt regarding deposition of Aimee Giglio	0.10 175.00/hr	17.50
	KBK	Review outline for deposition of Aimee Giglio	0.40 175.00/hr	70.00
	KBK	Email to Geoffrey Vitt regarding Aimee Giglio deposition	0.10 175.00/hr	17.50
	SN	Working on outlines for Giglio deposition	0.30 80.00/hr	24.00
	SN	Working on disability section of the outline and conferencing with GJV and JK to review documents and questions	2.60 80.00/hr	208.00
	SN	Edits to Disability section	0.20 80.00/hr	16.00
	SN	Reviewing documents to prepare for Giglio deposition; conf. With GJV on edits to questions;	1.80 80.00/hr	144.00
	SN	Conf. With JK RE disability/leave of absence documents and reviewed documents; reviewed documents that showed 10 employees/position in REI division only 3 terminated	0.90 80.00/hr	72.00
	JK	Email from GJV and conf. w/ SHN re: disability/leave of absence prepare and print document review set.	2.30 100.00/hr	230.00
	JK	Conf w/ G. Vitt and S. Nunan on Giglio deposition preparation; prepare email fact summary of REI team staff and positions; prepare memo on dates of REI closure and D-H announcement meetings.	2.70 100.00/hr	270.00
	JK	Phone call and emails w/ S. Schulman Unum legal; review VT rules; call to VT Secretary of State; update Unum subpoena to Providence name	0.60 100.00/hr	60.00
12/10/2019	GJV	Prepare for and take A. Giglio deposition	7.30 320.00/hr	2,336.00
	KBK	Attend portion of deposition of Aimee Giglio	4.00 175.00/hr	700.00
	KBK	Meetings with Geoffrey Vitt and Sarah Nunan regarding deposition and strategy	0.80 175.00/hr	140.00



Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2019	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	SN	Preparing for Giglio deposition	3.20 80.00/hr	256.00
	SN	Attended Giglio deposition	6.50 80.00/hr	520.00
	JK	Prepare for Giglio deposition; emails from G. Vitt; review documents on closure and hiring decisions.	3.10 100.00/hr	310.00
12/11/2019	GJV	Email w/ M. Porter and review email	0.20 320.00/hr	64.00
	GJV	T/c K. Kramer and email M. Porter	0.30 320.00/hr	96.00
	KBK	Email Misty Porter regarding deposition of Aimee Giglio and next steps; exchange emails with Misty Porter	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt	0.30 175.00/hr	52.50
	KBK	Telephone conference with Misty Porter regarding next steps	0.30 175.00/hr	52.50
	KBK	Exchange emails with Geoffrey Vitt regarding discovery issues	0.10 175.00/hr	17.50
	JK	Opposition response preparation.	3.60 100.00/hr	360.00
12/12/2019	JK	Review Unum/Providence files received in mail via encrypted cd; email to S. Schulman at Unum	1.20 100.00/hr	120.00
	JK	Receive and review order on in camera review of additional documents	0.10 100.00/hr	10.00
12/13/2019	GJV	Review letters; t/c D. Schroeder, J. Joseph, K. Kramer and t/c K. Kramer	0.80 320.00/hr	256.00
	KBK	Telephone conference with Don Schroeder and Geoffrey Vitt regarding plaintiffs fourth set of interrogatories	0.60 175.00/hr	105.00
	JK	Opposition response preparation	3.50 100.00/hr	350.00
12/14/2019	GJV	Letter to D. Schroeder	0.30 320.00/hr	96.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2019	KBK	Receive and review correspondence from Don Schroeder regarding discovery issues; exchange emails with Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
	JK	Opposition response documents review and preparation	3.60 100.00/hr	360.00
12/17/2019	JK	Review 12/17 Letter from Joseph to Crawford re: court order in camera review	0.10 100.00/hr	10.00
	JK	Opposition preparation	2.10 100.00/hr	210.00
12/18/2019	KBK	Receive and review correspondence from Dartmouth-Hitchcock	0.10 175.00/hr	17.50
12/19/2019	KBK	Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Receive and review correspondence from Jessica Joseph to Judge Crawford regarding in camera review; email to Jessica Joseph regarding same	0.10 175.00/hr	17.50
	KBK	Receive and review revised fourth set of interrogatories from Dartmouth-Hitchcock; email to Jessica Joseph regarding same	0.10 175.00/hr	17.50
12/20/2019	JK	Receive and review Giglio deposition transcript	1.80 100.00/hr	180.00
12/22/2019	GJV	Outline for remaining discovery	0.30 320.00/hr	96.00
12/23/2019	JK	Review Hartford paper documents rcvd via mail in response to subpoena	3.70 100.00/hr	370.00
12/24/2019	JK	Review Hartford paper documents rcvd via mail in response to subpoena	2.00 100.00/hr	200.00
12/27/2019	JK	Review Hartford paper documents rcvd via mail in response to subpoena	2.60 100.00/hr	260.00
12/30/2019	JK	Review Hartford paper documents rcvd via mail in response to subpoena	2.60 100.00/hr	260.00
For professional services rendered			127.50	\$20,818.50
Additional Charges :				
8/8/2019	Deposition Costs for E Todd - K Fleury			805.65

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	<u>Amount</u>
11/7/2019 Mediation : Hanover Inn	578.09
12/9/2019 Service fee: Office of Secretary of State, Vermont - for 1- service fee two corporate subpoenas	25.00
12/10/2019 Document Fee : Provident Life & Accident Ins. Co	59.05
12/21/2019 Deposition: North Country court Reporter	917.55
Total costs	<u>\$2,385.34</u>
Total amount of this bill	<u>\$23,203.84</u>
Previous balance	<u>\$148,574.03</u>
12/26/2019 Payment - thank you	<u>(\$15,000.00)</u>
Total payments and adjustments	<u>(\$15,000.00)</u>
Balance due	<u><u>\$156,777.87</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	37.60	320.00	\$12,032.00
Julia Korkus	54.20	100.00	\$5,420.00
Katherine B. Kramer	7.90	175.00	\$1,382.50
Sarah Nunan	24.80	80.00	\$1,984.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

February 14, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14121

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
1/7/2020	KBK	Receive and review Judge Crawford's order on motion for review of privileged documents	0.10 175.00/hr	17.50
	KBK	Telephone conference with Geoffrey Vitt regarding strategy and next steps	0.40 175.00/hr	70.00
	JK	Review Hartford documents in response to subpoena	3.00 100.00/hr	300.00
1/8/2020	KBK	Email to Don Schroeder and Jessica Joseph regarding motion for summary judgment briefing schedule	0.10 175.00/hr	17.50
1/9/2020	KBK	Telephone conference with Geoffrey Vitt regarding briefing schedule for motion for summary judgment; exchange emails with Don Schroeder and Jessica Joseph regarding same	0.20 175.00/hr	35.00
	KBK	Telephone conference with Don Schroeder regarding motion for summary judgment	0.20 175.00/hr	35.00
	JK	Review Hartford documents in response to subpoena	3.20 100.00/hr	320.00
	GJV	T/c K. Kramer re: summary judgment opposition	0.20 320.00/hr	64.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/10/2020	JK	Hartford review	2.80 100.00/hr	280.00
1/13/2020	KBK	Exchange emails with Jessica Joseph regarding stipulation on motion for summary judgment briefing	0.10 175.00/hr	17.50
	KBK	Exchange emails with Geoffrey Vitt regarding strategy	0.10 175.00/hr	17.50
	GJV	Emails re: affidavits for SJ opposition	0.20 320.00/hr	64.00
1/17/2020	KBK	Exchange emails with Geoffrey Vitt regarding next steps	0.10 175.00/hr	17.50
	GJV	Emails with K. Kramer and M. Porter re: privileged documents, witnesses and motion	0.30 320.00/hr	96.00
1/22/2020	SN	Reviewed new documents produced by DH and conferenced with JK RE content and production timeline	0.30 80.00/hr	24.00
	KBK	Receive and review documents from Jessica Joseph produced after in camera review by Judge Crawford	0.20 175.00/hr	35.00
	KBK	Exchange emails with Julia Korkus and Sarah Nunan regarding newly produced documents	0.10 175.00/hr	17.50
	JK	Review new documents and phone call w/ SHN on same	0.40 100.00/hr	40.00
1/28/2020	KBK	Telephone conference with Geoffrey Vitt regarding pending motion for summary judgment	0.20 175.00/hr	35.00
	GJV	Email K. Kramer and S. Nunan re: reply brief	0.20 320.00/hr	64.00
1/29/2020	KBK	Receive and briefly review summary judgment filing by Dartmouth-Hitchcock; exchange emails with Geoffrey Vitt regarding same	0.20 175.00/hr	35.00
	GJV	Opposition to motion for summary judgment	0.60 320.00/hr	192.00
1/30/2020	SN	Reviewing undisputed facts	0.30 80.00/hr	24.00
	KBK	Review and assess motion for summary judgment and supporting documents filed by Dartmouth-Hitchcock	1.30 175.00/hr	227.50
	KBK	Telephone conference with Geoffrey Vitt regarding motion for summary judgment	0.30 175.00/hr	52.50



Misty Porter

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2020	KBK Exchange emails with Misty Porter regarding motion for summary judgment	0.10 175.00/hr	17.50
1/31/2020	JK Receive & review Def Motion for Summary Judgment; prepare notes	2.40 100.00/hr	240.00
	JK Prepare Opp to MSJ documents for GJV	0.80 100.00/hr	80.00
	JK Begin response chart of key document re. Oppt to MSJ	1.70 100.00/hr	170.00
	JK Receive and review two new native documents re. Prod 20 from J. Joesph.	0.30 100.00/hr	30.00
	For professional services rendered	20.40	\$2,635.50
	Additional Charges :		
8/19/2019	Document Retrieval		0.20
11/9/2019	Fee: for document production		35.00
	Total costs		\$35.20
	Total amount of this bill		\$2,670.70
	Previous balance		\$156,777.87
1/30/2020	Payment - thank you		(\$12,000.00)
	Total payments and adjustments		(\$12,000.00)
	Balance due		\$147,448.57

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	1.50	320.00	\$480.00
Julia Korkus	14.60	100.00	\$1,460.00
Katherine B. Kramer	3.70	175.00	\$647.50
Sarah Nunan	0.60	80.00	\$48.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

March 13, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14207

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
2/1/2020	SN	Reviewed DH's Memo on MSJ and made notes	1.50 150.00/hr	225.00
	SN	Reviewed deposition exhibits with regard to MSJ	0.80 150.00/hr	120.00
	GJV	Prepare response to DH motion for summary judgment	1.20 320.00/hr	384.00
2/2/2020	SN	Prepared for meeting on Motion for Summary Judgment	1.60 150.00/hr	240.00
	GJV	Prepare opposition to DH motion for summary judgment	3.70 320.00/hr	1,184.00
2/3/2020	KBK	Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Meeting with Geoffrey Vitt, Sarah Nunan, and Julia Korkus to prepare response to defendants' motion for summary judgment	2.50 175.00/hr	437.50
	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	SN	Meeting with KBK, GJV, and JK RE response to DH's motion for summary judgment	2.50 150.00/hr	375.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2020	SN	Conf. With GJV RE Nora at VN; reviewed two emails and conf. With GJV	0.40 150.00/hr	60.00
	JK	Meet w/ GJV, SHN, KBK to prepare response in opposition to defendants' motion for summary judgment.	2.50 100.00/hr	250.00
	JK	Prepare for meeting.	0.10 100.00/hr	10.00
	JK	Revise index of key case documents.	1.70 100.00/hr	170.00
	JK	Discussion w/ S. Nunan re. strategy around media handling of MSJ.	0.10 100.00/hr	10.00
	GJV	Conference with KBK, SN and JK re: outline for opposition memorandum and review draft affidavits; Memorandum in opposition	2.50 320.00/hr	800.00
	GJV	Memorandum in opposition	0.90 320.00/hr	288.00
	GJV	Conference with S. Nunan re: response to VN	0.40 320.00/hr	128.00
2/4/2020	KBK	Review deposition transcripts and other record materials for summary judgment preparation	0.70 175.00/hr	122.50
	SN	Conf. With GJV RE memo of meeting; drafted and sent memo of meeting	0.80 150.00/hr	120.00
	JK	Review deposition transcripts and discovery documents to prepare response in opposition to defendants' motion for summary judgment.	2.40 100.00/hr	240.00
	JK	Review and revise index of key documents; planning for opp to MSJ	2.30 100.00/hr	230.00
	GJV	Outline for summary judgment issue	0.30 320.00/hr	96.00
2/5/2020	JK	Review and prepare supporting witness documents re. Opp to MSJ	1.20 100.00/hr	120.00
	JK	Prepare template of response brief	0.50 100.00/hr	50.00
2/6/2020	KBK	Prepare response to motion for summary judgment	0.10 175.00/hr	17.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/6/2020	KBK	Telephone conference with potential witness for opposing summary judgment	0.30 175.00/hr	52.50
	KBK	Prepare draft affidavit for support of opposition to summary judgment	0.50 175.00/hr	87.50
	SN	Reviewing Gunnell Transcript	0.80 150.00/hr	120.00
	JK	Review and highlight Conroy deposition transcript re. Opposition to MSJ.	1.50 100.00/hr	150.00
	JK	Prepare witness list re. Trial and subpoena preparation	0.80 100.00/hr	80.00
	JK	Review Def. MSJ; prepare key documents and email to G. Vitt and S. Nunan re. response in opposition to MSJ.	2.40 100.00/hr	240.00
2/7/2020	KBK	Exchange emails with Geoffrey Vitt regarding affidavits for motion for summary judgment	0.20 175.00/hr	35.00
	JK	Review deposition transcript and other records to prepare response to defs' motion for summary judgment.	2.60 100.00/hr	260.00
	JK	Review notes, claims chart, and Defs' MSJ w/ statement of undisputed material facts and exhibits.	1.80 100.00/hr	180.00
	GJV	Email KBK re: Russell affidavit	0.20 320.00/hr	64.00
2/8/2020	GJV	Outline Demars material and Summary Judgment opposition	0.60 320.00/hr	192.00
2/9/2020	SN	Reviewing Gunnell deposition; conf with GJV RE S. Parent; emailed summary to GJV	0.90 150.00/hr	135.00
	GJV	Work on opposition to summary judgment including work on affidavits	1.40 320.00/hr	448.00
2/10/2020	KBK	Travel to Norwich	1.50 175.00/hr	NO CHARGE
	KBK	Meeting with Geoffrey Vitt regarding motion for summary judgment affidavits	0.10 175.00/hr	17.50
	KBK	Meeting with Sarah Nunan regarding motion for summary judgment	0.30 175.00/hr	52.50
	KBK	Meeting with Geoffrey Vitt and witness for summary judgment affidavit	1.30 175.00/hr	227.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/10/2020	KBK	Return travel from Norwich	1.50 175.00/hr	NO CHARGE
	SN	Meeting with GJV & KBK planning response to motion for summary judgment	0.80 150.00/hr	120.00
	SN	Reviewing Transcript of Heather Gunnell; emailed quote to GJV	1.40 150.00/hr	210.00
	JK	Review supporting documents and claims chart, re. Defs' MSJ w/ statement of undisputed material facts and exhibits.	1.50 100.00/hr	150.00
	JK	Review witness statements and deposition transcript to prepare response to defs' motion for summary judgment (Herrick, Todd, Merrens, King)	2.80 100.00/hr	280.00
	GJV	Conference with K. Kramer and M. Russell and prepare summary	1.80 320.00/hr	576.00
	GJV	Emails and file memo on M. Russell	0.60 320.00/hr	192.00
	GJV	E-mail with client	0.20 320.00/hr	64.00
	SN	Meeting with KBK re: motion for summary judgment	0.30 150.00/hr	45.00
2/11/2020	KBK	Revise affidavit of witness in support of opposition to motion for summary judgment	1.50 175.00/hr	262.50
	KBK	Review depositions to prepare for opposition to motion for summary judgment	4.40 175.00/hr	770.00
	KBK	Exchange emails with Geoffrey Vitt regarding strategy and next steps	0.10 175.00/hr	17.50
	SN	Review email on planning from GJV	0.10 150.00/hr	15.00
	JK	Review witness statements and deposition transcript to prepare response to defs' motion for summary judgment.	3.40 100.00/hr	340.00
	JK	Emails w/ G. Vitt re. confidentiality and next steps; review Protective Order	0.40 100.00/hr	40.00
	GJV	File memorandum on M. Russell meeting	0.40 320.00/hr	128.00
	GJV	Review draft affidavit	0.50 320.00/hr	160.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/12/2020	SM	Research re: summary judgment in Second Circuit employment law cases	1.60 200.00/hr	320.00
	SM	Email to G. Vitt re: Second Circuit cases noting that summary judgment is not appropriate in employment discrimination	0.10 200.00/hr	20.00
	JK	Revise master list of quotes to prepare response to defs' motion for summary judgment.	0.70 100.00/hr	70.00
	JK	Receive and review transcript pages from G. Vitt re. preparation for response to defs' motion for summary judgment.	0.80 100.00/hr	80.00
	JK	Revise index and notes and review documents in preparation for response to defs' motion for summary judgment.	2.60 100.00/hr	260.00
	GJV	Review transcripts of depositions for summary judgment opposition	4.50 320.00/hr	1,440.00
2/13/2020	KBK	Review depositions for summary judgment	0.40 175.00/hr	70.00
	KBK	Telephone conference with Geoffrey Vitt, Sarah Nunan, Julia Korkus and Sarah Merlo regarding opposition to motion for summary judgment	0.90 175.00/hr	157.50
	KBK	Email to team regarding motion for summary judgment planning	0.20 175.00/hr	35.00
	KBK	Exchange emails with Misty Porter regarding summary judgment briefing	0.10 175.00/hr	17.50
	SM	Conf. call with legal team re: preparing opposition to Mot. for Summary Judgment	0.90 200.00/hr	180.00
	SM	Review chart with summary of claims	0.30 200.00/hr	60.00
	SM	Review K. Kramer email re: steps and deadlines in preparation for response to motion for summary judgment.	0.10 200.00/hr	20.00
	SM	Research re: summary judgment standard	2.90 200.00/hr	580.00
	SN	Conf. Call with KBK, SJM, GJV, and JK RE MSJ	0.90 150.00/hr	135.00
	JK	Meet w/ GJV, SHN, KBK, SJM to prepare response in opposition to defendants' motion for summary judgment; email to SJM.	1.00 100.00/hr	100.00
	JK	Review deposition transcript and other documents to prepare for meeting and response to defs' motion for summary judgment.	2.40 100.00/hr	240.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
2/13/2020	JK	Review claims chart and email to S. Merlo.	0.60 100.00/hr	60.00
	GJV	Conf. call and review outlines for affidavits	1.80 320.00/hr	576.00
2/14/2020	SM	Research re: summary judgment standard	2.40 200.00/hr	480.00
	GJV	Prepare and revise affidavits	0.60 320.00/hr	192.00
2/15/2020	GJV	Affidavit of S. Parent and DeMars outline	1.70 320.00/hr	544.00
2/16/2020	GJV	J. MacCallum affidavit	1.70 320.00/hr	544.00
2/17/2020	KBK	Review documents from Julia Korkus for summary judgment opposition	0.20 175.00/hr	35.00
	JK	Receive and review transcript pages from G. Vitt re. preparation for response to defs' motion for summary judgment.	0.70 100.00/hr	70.00
	JK	Prepare documents in support of response to defs' motion for summary judgment.	4.10 100.00/hr	410.00
	GJV	Work on Parent, Russell, and MacCallum affidavits	2.30 320.00/hr	736.00
2/18/2020	JK	Review transcripts sets re. preparation for response to defs' motion for summary judgment; email to KBK	0.80 100.00/hr	80.00
	JK	Revise index and notes and review documents in preparation for response to defs' motion for summary judgment.	3.20 100.00/hr	320.00
	GJV	Review affidavits	0.20 320.00/hr	64.00
	GJV	Revise J. MacCallum affidavit	0.40 320.00/hr	128.00
	GJV	Review and edit S. Parent affidavit	0.50 320.00/hr	160.00
	GJV	Work on affidavits and outline for brief	1.50 320.00/hr	480.00
2/19/2020	KBK	Draft opposition to motion to summary judgment	0.10 175.00/hr	17.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/19/2020	JK	Review transcripts re. preparation for response to defs' motion for summary judgment.	2.60 100.00/hr	260.00
2/20/2020	KBK	Draft opposition to motion for summary judgment; circulate draft to team	3.30 175.00/hr	577.50
	SM	Review preliminary draft of response to motion for summary judgment	0.90 200.00/hr	180.00
	SM	Research re: summary judgment	0.90 200.00/hr	180.00
	SM	Draft memo re: standard for summary judgment	1.30 200.00/hr	260.00
	JK	Receive and review draft response in opp to defs' motion for summary judgment; review supporting documents	1.40 100.00/hr	140.00
	JK	Conf. w/ G. Vitt re: preparation for response to defs' motion for summary judgment.	0.10 100.00/hr	10.00
	JK	Prepare documents in support of response to defs' motion for summary judgment.	4.00 100.00/hr	400.00
	GJV	Review draft Declaration and email S. Parent	0.30 320.00/hr	96.00
	GJV	E-mail S. Parent	0.10 320.00/hr	32.00
	GJV	Revise Declaration and email S. Parent	0.30 320.00/hr	96.00
	GJV	Work on opposition to summary judgment	1.10 320.00/hr	352.00
	GJV	Revise affidavits and work on memorandum	1.50 320.00/hr	480.00
2/21/2020	KBK	Prepare for conference call; conference call on motion for summary judgment with Geoffrey Vitt, Sarah Nunan, Julia Korkus and Sarah Merlo	1.80 175.00/hr	315.00
	SM	Research re: Crawford decisions	1.30 200.00/hr	260.00
	SM	Review G. Vitt memo re: opposition	0.10 200.00/hr	20.00
	SM	Tel. call with G. Vitt, K. Kramer, S. Nunan, and J. Korkus re: response to DH motion for summary judgment	1.40 200.00/hr	280.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2020	SM	Email to K. Kramer re: summary judgment standard	0.10 200.00/hr	20.00
	SM	Draft memo re: summary judgment standard	0.80 200.00/hr	160.00
	JK	Meet w/ GJV, SHN, KBK to prepare response in opposition to defendants' motion for summary judgment.	1.80 100.00/hr	180.00
	JK	Review witness affidavit.	0.60 100.00/hr	60.00
	JK	Receive and review G. Vitt questions about reply brief; review records.	1.70 100.00/hr	170.00
	JK	Review email and supporting statements from S. Merlo	0.70 100.00/hr	70.00
	GJV	Work on reply to DH motion for summary judgment	8.70 320.00/hr	2,784.00
2/22/2020	GJV	Edit and revise opposition to Motion for Summary Judgment and memorandum on elements of Affidavit for MBP	4.80 320.00/hr	1,536.00
2/23/2020	GJV	Opposition to DH motion for summary judgment	5.70 320.00/hr	1,824.00
2/24/2020	JK	Prepare supporting documents by topic for G. Vitt in preparation for response to defs' motion for summary judgment; revise index.	3.90 100.00/hr	390.00
	JK	Conf. w/ G. Vitt re: preparation for response to defs' motion for summary judgment.	0.10 100.00/hr	10.00
	GJV	Opposition to DH motion for summary judgment	3.90 320.00/hr	1,248.00
2/25/2020	KBK	Review and annotate deposition transcripts for summary judgment opposition; email to Julia Korkus regarding same	3.20 175.00/hr	560.00
	SN	Conf with GJV RE disability claims	0.40 150.00/hr	60.00
	JK	Conf. w/ G. Vitt re. Revisions to Opposition to MSJ	0.10 100.00/hr	10.00
	JK	Receive and review transcript highlights from KBK.	0.80 100.00/hr	80.00
	JK	Prepare supporting documents in preparation for response to defs' motion for summary judgment.	3.80 100.00/hr	380.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/25/2020	JK	Conf. w/ G. Vitt re: preparation for response to defs' motion for summary judgment.	0.10 100.00/hr	10.00
	GJV	Review S. Parent email	0.20 320.00/hr	64.00
	GJV	Opposition to Summary Judgment	4.80 320.00/hr	1,536.00
2/26/2020	JK	Email and conf. w/ G. Vitt re: preparation for response to defs' motion for summary judgment.	0.20 100.00/hr	20.00
	JK	Prepare documents, transcript pages, in support of response to defs' motion for summary judgment.	3.80 100.00/hr	380.00
	GJV	Opposition to summary judgment motion	2.90 320.00/hr	928.00
2/27/2020	KBK	Call to Geoffrey Vitt and leave message; telephone conference with Sarah Numan regarding summary judgment	0.20 175.00/hr	35.00
	SM	Research re: recent changes to the disability discrimination causation standard in Vermont and the Second Circuit	2.60 200.00/hr	520.00
	SM	Emails with G. Vitt re: discrimination standard	0.20 200.00/hr	40.00
	SM	Email to G. Vitt re: whether ADA claims can successfully co-exist with other claims	0.10 200.00/hr	20.00
	SN	Review latest version of memo and conf with GJV	1.40 150.00/hr	210.00
	SN	Review DeMars depo and print quotes to support claim in memo;	1.10 150.00/hr	165.00
	SN	Conference with GJV and JK RE documentation in support of memo	0.60 150.00/hr	90.00
	SN	Conf with JK RE documents on REI department	0.40 150.00/hr	60.00
	SN	Review next draft of memo and conf with GJV on disability claim evidence	0.50 150.00/hr	75.00
	JK	Prepare documents by topic in support of response to defs' motion for summary judgment.	2.60 100.00/hr	260.00
	GJV	Opposition to motion for summary judgment	6.20 320.00/hr	1,984.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/27/2020	SN	Call w/ KBK	0.10 150.00/hr	15.00
2/28/2020	KBK	Telephone conference with Geoffrey Vitt, Sarah Nunan and Julia Korkus regarding motion for summary judgment	0.60 175.00/hr	105.00
	KBK	Email to Sarah Merlo regarding motion for summary judgment	0.20 175.00/hr	35.00
	KBK	Email to Sarah Merlo regarding motion for summary judgment	0.30 175.00/hr	52.50
	SM	Review K. Kramer email re: research needed	0.10 200.00/hr	20.00
	SN	Conf. call with GJV, KBK, and JK RE status of brief and documents	0.60 150.00/hr	90.00
	SN	Meeting with Sharon Parent	0.90 150.00/hr	135.00
	JK	Meet w/ GJV, SHN, KBK to review response in opposition to defendants' motion for summary judgment.	0.60 100.00/hr	60.00
	GJV	Work on opposition to summary judgment and conference SHN and S. Parent	2.60 320.00/hr	832.00
	GJV	Review draft opposition to motion for summary judgment and edit brief	2.60 320.00/hr	832.00
	GJV	Conf. call w/ KBK, SHN, JK re: motion for summary judgment	0.60 320.00/hr	192.00
2/29/2020	GJV	Opposition to summary judgment motion	2.20 320.00/hr	704.00
For professional services rendered			218.60	\$43,020.50
Additional Charges :				
2/12/2020	Electronic research charges.			106.92
2/13/2020	Electronic research charges.			121.80
	Conference Call			10.77
2/14/2020	Electronic research charges.			91.89

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	<u>Amount</u>
2/20/2020 Electronic research charges.	29.90
2/21/2020 Conference Call	18.07
2/27/2020 Electronic research charges.	67.79
Electronic research charges.	78.12
Total costs	<u>\$525.26</u>
Total amount of this bill	<u>\$43,545.76</u>
Previous balance	<u>\$147,448.57</u>
2/20/2020 Payment - thank you	<u>(\$2,670.70)</u>
Total payments and adjustments	<u>(\$2,670.70)</u>
Balance due	<u><u>\$188,323.63</u></u>

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	78.40	320.00	\$25,088.00
Julia Korkus	73.80	100.00	\$7,380.00
Katherine B. Kramer	23.50	175.00	\$4,112.50
Sarah Nunan	18.80	150.00	\$2,820.00
Sarah Merlo	18.10	200.00	\$3,620.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

April 13, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14276

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
3/1/2020	GJV	T/c Dr. MacCallum	0.20 320.00/hr	64.00
	GJV	Work on opposition to DH motion for summary judgment	2.20 320.00/hr	704.00
	GJV	T/c KBK re: opposition to motion for summary judgment and work on draft affidavits	1.10 320.00/hr	352.00
	GJV	Work on memorandum in opposition to motion for summary judgment	1.60 320.00/hr	512.00
3/2/2020	SM	Research re: interplay of whistleblower and state common law wrongful discharge claims	2.10 200.00/hr	420.00
	SM	Draft research memo re: preemption	1.30 200.00/hr	260.00
	KBK	Review and revise opposition to motion for summary judgment; exchange emails with Geoffrey Vitt regarding same	6.40 175.00/hr	1,120.00
	GJV	Work on draft affidavits and opposition to motion for summary judgment	2.70 320.00/hr	864.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/3/2020	SM	Emails with K. Kramer re: preemption	0.10 200.00/hr	20.00
	SM	Draft research memo re: preemption	0.40 200.00/hr	80.00
	KBK	Telephone conference with Geoffrey Vitt	0.50 175.00/hr	87.50
	KBK	Telephone conference with Michelle Russell regarding affidavit	0.20 175.00/hr	35.00
	KBK	Review memorandum from Sarah Merlo regarding termination claim	0.10 175.00/hr	17.50
	KBK	Review and revise affidavit of Julia MacCallum in support of motion for summary judgment	0.30 175.00/hr	52.50
	KBK	Email to Misty Porter regarding opposition to summary judgment	0.10 175.00/hr	17.50
	KBK	Revise opposition to motion for summary judgment	3.60 175.00/hr	630.00
	JK	Review draft of opp to MSJ, edits.	1.20 100.00/hr	120.00
	JK	Research on sealing motions and handling of confidential material during discovery vs. motions.	1.90 100.00/hr	190.00
	JK	Phone calls w/ clerk of court re: filing process.	0.20 100.00/hr	20.00
	GJV	Review Russell and MacCallum affidavits	0.30 320.00/hr	96.00
	GJV	Work on memorandum in opposition to motion for summary judgment	3.90 320.00/hr	1,248.00
3/4/2020	KBK	Meeting with Geoffrey Vitt regarding motion for summary judgment	0.30 175.00/hr	52.50
	KBK	Prepare for meeting with Misty Porter	0.20 175.00/hr	35.00
	KBK	Meeting with Geoffrey Vitt and Misty Porter regarding motion for summary judgment	2.00 175.00/hr	350.00
	KBK	Revise opposition to motion for summary judgment	1.90 175.00/hr	332.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2020	JK Preparation, review and edits re: plaintiff's response in opposition to defs MSJ.	3.50 100.00/hr	350.00
	JK Exhibit preparation for Plaintiff's response in Opp to MSJ.	2.80 100.00/hr	280.00
	GJV Work on memorandum in opposition to DH motion for summary judgment including review of affidavits and exhibits	4.20 320.00/hr	1,344.00
	SN Conf. with GJV and KBK re filing opposition	0.30 150.00/hr	45.00
3/5/2020	KBK Revise opposition to motion for summary judgment	3.00 175.00/hr	525.00
	KBK Telephone conference with Julia Korkus regarding motion for summary judgment	0.50 175.00/hr	87.50
	KBK Exchange emails with Julia Korkus regarding filing under seal; exchange emails with Geoffrey Vitt regarding trial	0.20 175.00/hr	35.00
	KBK Exchange emails with Jessica Joseph regarding confidentiality designation	0.10 175.00/hr	17.50
	KBK Draft and revise statement of disputed material facts	1.20 175.00/hr	210.00
	JK Preparation, review and edits re: plaintiff's response in opposition to defs MSJ.	3.90 100.00/hr	390.00
	JK Phone conference and emails w/ KBK re: Opp to MSJ preparation.	0.70 100.00/hr	70.00
	JK Exhibit preparation for Plaintiff's response in Opp to MSJ.	2.10 100.00/hr	210.00
	GJV Review revised MacCallum Declaration	0.30 320.00/hr	96.00
	GJV Review exhibits for memorandum	0.20 320.00/hr	64.00
	GJV Review exhibits for memorandum and revise memorandum	2.60 320.00/hr	832.00
3/6/2020	KBK Multiple telephone conferences with Sarah Nunan	0.50 175.00/hr	87.50
	KBK Revise opposition to motion for summary judgment	2.10 175.00/hr	367.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2020	KBK	Telephone conference with Julia Korkus regarding opposition to motion for summary judgment	0.10 175.00/hr	17.50
	JK	Review, edits and prepare final filing for Plaintiff's Response in Opp to MSJ.	3.50 100.00/hr	350.00
	JK	Round-trip travel to hand-deliver provisionally sealed filing to District Courthouse in Rutland VT.	2.50 100.00/hr	250.00
	JK	Discussion w/ Court clerk re: provisionally sealed filing in VT District Courthouse, Rutland VT.	0.20 100.00/hr	20.00
	GJV	Review exhibits and consider confidentiality issue	0.30 320.00/hr	96.00
	SN	Conf. with GJV; Conf. with JK, call KBK all to coordinate finalizing drafts;	1.10 150.00/hr	165.00
	SN	Drafting section on Herrick and checking references	1.10 150.00/hr	165.00
	SN	Revisions to drafts of both opposition motion and disputed fact briefs with KBK and JK	3.10 150.00/hr	465.00
3/9/2020	KBK	Exchange emails with Jessica Joseph regarding confidentiality designation	0.30 175.00/hr	52.50
	JK	Document organization from opp to MSJ preparation	2.70 100.00/hr	270.00
3/10/2020	JK	Review and organize documents generated during opp to MSJ preparation.	2.30 100.00/hr	230.00
	GJV	Review confidential documents and motion	0.40 320.00/hr	128.00
3/11/2020	KBK	Telephone conference with Julia Korkus regarding confidentiality designation for motion for summary judgment	0.20 175.00/hr	35.00
	JK	Email and conf. w/ G. Vitt on confidential documents and meeting with defense counsel.	0.10 100.00/hr	10.00
	JK	Prepare for meeting w/ defense counsel, G. Vitt and K. B. Kramer.	1.80 100.00/hr	180.00
	JK	Conf. w/ KBK Opp to MSJ	0.20 100.00/hr	20.00
3/12/2020	KBK	Prepare for telephone conference with Don Schroeder and Jessica Joseph regarding confidentiality designations; telephone conference with Don Schroeder and Jessica Joseph regarding confidentiality designations	0.80 175.00/hr	140.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/12/2020	GJV	Review jury trial issues and email KBK	0.20 320.00/hr	64.00
	GJV	T/c KBK, Schroeder and Joseph	0.50 320.00/hr	160.00
3/16/2020	KBK	Exchange emails with Geoffrey Vitt regarding trial and summary judgment; Exchange emails with Jessica Joseph regarding confidentiality designations	0.20 175.00/hr	35.00
3/17/2020	KBK	Receive and review email from Jessica Joseph regarding confidentiality designation for documents supporting motion for summary judgment; email to Geoffrey Vitt regarding same; email to Jessica Joseph and Don Schroeder regarding same	0.30 175.00/hr	52.50
3/18/2020	SM	Research re: public access to sealed court exhibits	0.80 200.00/hr	160.00
	SM	Emails with G. Vitt re: need for motion to unseal exhibits	0.20 200.00/hr	40.00
	KBK	Telephone conference with Geoffrey Vitt regarding confidentiality designations of motion for summary judgment exhibits	0.30 175.00/hr	52.50
	JK	Review and prepare key documents for trial preparation.	1.50 100.00/hr	150.00
	GJV	Review issues with oral argument on motion for summary judgment and response	0.50 320.00/hr	160.00
	GJV	Review DH position on confidential designation for exhibits and motion and t/c KBK re: motion	0.60 320.00/hr	192.00
	GJV	Outline for motion	0.20 320.00/hr	64.00
3/19/2020	SM	Emails with G. Vitt & J. Korkus re: exhibits	0.10 200.00/hr	20.00
	JK	Organize key document boxes from office by subject for trial preparation.	1.70 100.00/hr	170.00
	GJV	Motion re: confidential documents in exhibits to summary judgment opposition	0.30 320.00/hr	96.00
3/21/2020	SM	Research re: public access to judicial documents	1.40 200.00/hr	280.00
3/23/2020	SM	Research re: public access to court documents	1.10 200.00/hr	220.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2020	SM	Emails with G. Vitt re: memorandum	0.10 200.00/hr	20.00
	SM	Draft memorandum	3.20 200.00/hr	640.00
	KBK	Draft request for status conference regarding confidentiality designation of exhibits to opposition to motion for summary judgment; file request for status conference	0.40 175.00/hr	70.00
	JK	Organize key document boxes from office by subject for trial preparation.	1.20 100.00/hr	120.00
3/24/2020	SM	Research re: right of access to judicial documents and interplay of federal and state privilege law	2.70 200.00/hr	540.00
	SM	Conf. call with G. Vitt and K. Kramer re: efforts to unseal exhibits	0.50 200.00/hr	100.00
	SM	Draft memorandum in support of motion for status conference	3.40 200.00/hr	680.00
	KBK	Review draft of motion from Sarah Merlo; email to Sarah Merlo and Geoffrey Vitt regarding motion	0.30 175.00/hr	52.50
	KBK	Telephone conference with Sarah Merlo and Geoffrey Vitt regarding confidentiality designation and motion for summary judgment	0.60 175.00/hr	105.00
	GJV	Review draft memorandum re: motion to compel on confidential documents and emails with S. Merlo and KBK re: draft	0.60 320.00/hr	192.00
3/25/2020	KBK	Exchange emails with Sarah Merlo regarding confidentiality designations; review and revise memorandum regarding confidentiality designations; email to court chambers regarding request for review of confidentiality designations	1.20 175.00/hr	210.00
	JK	Organize key document boxes from office by subject for trial preparation.	1.80 100.00/hr	180.00
	GJV	Review revised memorandum and email KBK	0.30 320.00/hr	96.00
	GJV	Emails with KBK and S. Merlo re: changes in exhibits and memorandum and filing	0.30 320.00/hr	96.00
3/27/2020	KBK	Receive and review reply in support of motion for summary judgment	0.60 175.00/hr	105.00
	GJV	Review D-H reply to plaintiff's reply to motion for summary judgment	0.40 320.00/hr	128.00



Misty Porter

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	<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2020 GJV Prepare memorandum re: witnesses and trial	0.30 320.00/hr	96.00
3/30/2020 JK Organize key document boxes from office by subject for trial preparation.	1.50 100.00/hr	150.00
For professional services rendered	113.00	\$20,781.50
Additional Charges :		
3/2/2020 Electronic research charges.		261.07
3/18/2020 Electronic research charges.		32.61
3/21/2020 Electronic research charges.		133.53
3/23/2020 Electronic research charges.		256.86
3/24/2020 Electronic research charges.		94.89
Conference Call		6.88
Total costs		\$785.84
Total amount of this bill		\$21,567.34
Previous balance		\$188,323.63
3/19/2020 Payment - thank you		(\$30,000.00)
Total payments and adjustments		(\$30,000.00)
Balance due		\$179,890.97

## Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	24.20	320.00	\$7,744.00
Julia Korkus	37.30	100.00	\$3,730.00
Katherine B. Kramer	28.50	175.00	\$4,987.50
Sarah Nunan	5.60	150.00	\$840.00
Sarah Merlo	17.40	200.00	\$3,480.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

May 15, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14341

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
4/2/2020	JK Identify witness documents in preparation for trial; update log	2.30 100.00/hr	230.00
	JK Phone call w/ G Vitt re. trial preparation planning	0.10 100.00/hr	10.00
4/3/2020	JK Identify witness documents in preparation for trial; update log	2.50 100.00/hr	250.00
4/20/2020	JK Identify witness documents in preparation for trial; update log	2.30 100.00/hr	230.00
4/21/2020	JK Identify witness documents in preparation for trial; update log	2.40 100.00/hr	240.00
4/27/2020	JK Trial preparation - witness document preparation	2.10 100.00/hr	210.00
4/28/2020	JK Identify witness documents in preparation for trial; update log	2.60 100.00/hr	260.00
	For professional services rendered	14.30	\$1,430.00
	Previous balance		\$179,890.97
	4/20/2020 Payment - thank you		(\$10,000.00)

Misty Porter

Page 2

Amount

Total payments and adjustments

(\$10,000.00)

Balance due

\$171,320.97

Lawyer/paralegal Summary				
<u>Name</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Julia Korkus		14.30	100.00	\$1,430.00



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

July 16, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14472

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
5/29/2020	GJV	Review MBP email; t/c KBK and review draft email	0.20 320.00/hr	64.00
6/1/2020	JK	Review Defendants' Memorandum Regarding Confidentiality Designations of SJ Exhibits; review exhibits	0.40 100.00/hr	40.00
	JK	Review 6/1 Notice of Hearing	0.10 100.00/hr	10.00
	GJV	T/c KBK	0.20 320.00/hr	64.00
6/2/2020	JK	Review minute entry and order re. confidentiality and sealing of documents; review documents and toc.	0.40 100.00/hr	40.00
	GJV	Emails with KBK and review DH filing; conference call with court and counsel, and t/c KBK	0.80 320.00/hr	256.00
	GJV	Email MBP	0.20 320.00/hr	64.00
6/3/2020	JK	Review notice and documents re. unsealing documents	0.20 100.00/hr	20.00
	JK	Review emails from GJV and KBK re. court order on status of sealed/unsealed documents and next filing steps	0.30 100.00/hr	30.00

Misty Porter

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/3/2020	GJV	Review several court orders re: status conference and motion	0.20 320.00/hr	64.00
	GJV	Review several court orders and t/c KBK re: orders	0.20 320.00/hr	64.00
	GJV	Review Memorandum in Opposition to Summary Judgment and Statement of Undisputed Material Facts and determine what portions must be redacted in view of court order	1.20 320.00/hr	384.00
6/4/2020	JK	Phone call w/ GJV to discuss filing of redacted documents Memo in Opposition	0.20 100.00/hr	NO CHARGE
	GJV	Review KBK email re: confidentiality issues and email J. Korkus	0.20 320.00/hr	64.00
6/5/2020	JK	Prepare email to Defense counsel re. proposed redactions in Plaintiff's Opp to MSJ; emails w/ GJV on same; review documents.	0.70 100.00/hr	70.00
	JK	Emails from GJV and KBK re. redacted version of Ex. 19 and correspondence w/ defense counsel, review document	0.30 100.00/hr	NO CHARGE
6/8/2020	JK	Review redactions comments from J. Joseph.	0.10 100.00/hr	NO CHARGE
	JK	Emails w/ J. Joseph and G. Vitt re. proposed redactions to Plaintiff's Response in Opp to MSJ and Statement of Material Facts	0.30 100.00/hr	30.00
6/15/2020	JK	Prepare, redact, and file redacted Plaintiff's Response in Opposition to Def.'s Motion for SJ, Statement of Material Facts and Redacted Ex. 19	1.10 100.00/hr	110.00
	JK	Phone calls and follow-up w/ clerk's office re. guidance on correct process of filing redacted documents; review e-filing information	0.70 100.00/hr	70.00
6/20/2020	GJV	Review public record issue	0.20 320.00/hr	NO CHARGE
		For professional services rendered	8.20	\$1,444.00
		Previous balance		\$171,320.97
		5/20/2020 Payment - thank you		(\$1,430.00)
		Total payments and adjustments		(\$1,430.00)
		Balance due		\$171,334.97

Misty Porter

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Lawyer/paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Geoffrey J. Vitt	3.20	320.00	\$1,024.00
Julia Korkus	4.20	100.00	\$420.00





Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

August 14, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14551

	<u>Amount</u>
Previous balance	\$171,334.97
7/21/2020 Payment - thank you	(\$1,444.00)
Total payments and adjustments	(\$1,444.00)
Balance due	<u>\$169,890.97</u>



Vitt & Associates  
LAW OFFICE

Invoice submitted to:

Misty Porter  
128 Mystic Drive  
Norwich, VT 05055

September 14, 2020

In Reference To: Porter, Misty Blanchette Re. Employment matter

Invoice #: 2019-14627

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2020	KBK	Receive and review statement regarding confidentiality; telephone conference with Geoffrey Vitt regarding status conference and scheduling issues	0.40 175.00/hr	70.00
6/2/2020	KBK	Prepare for status conference; status conference with Judge Crawford; telephone conference with Geoffrey Vitt regarding status conference	1.20 175.00/hr	210.00
	KBK	Exchange emails with Misty Porter and Geoffrey Vitt regarding status conference	0.20 175.00/hr	35.00
6/3/2020	KBK	Receive and review court order unsealing exhibits to motion for summary judgment; email to Geoffrey Vitt regarding same	0.10 175.00/hr	17.50
6/4/2020	KBK	Exchange emails with Geoffrey Vitt regarding summary judgment redactions	0.10 175.00/hr	17.50
6/8/2020	KBK	Review email from Jessica Joseph and Geoffrey Vitt regarding redacted motion for summary judgment	0.10 175.00/hr	17.50
6/22/2020	KBK	Exchange emails with Misty Porter and Geoffrey Vitt regarding publicity	0.20 175.00/hr	35.00
7/16/2020	KBK	Updated Notice of Appearance for Attorney Kramer and file same with the court	0.30 250.00/hr	75.00
For professional services rendered			2.60	\$477.50

Misty Porter

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	<u>Amount</u>
Previous balance	<u>\$169,890.97</u>
Balance due	<u><u>\$170,368.47</u></u>

Lawyer/paralegal Summary				
<u>Name</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Katherine B. Kramer		0.30	250.00	\$75.00
Katherine B. Kramer		2.30	175.00	\$402.50